

East Decatur Greenway

Post Office Box 2316
Decatur, Georgia 30031

January 22, 2014

Mr. Don West
Environmental Management Support, Inc.
8601 Georgia Avenue, Suite 500
Silver Springs, Maryland 20910

RE: EPA Hazardous Brownfield Cleanup Application
890 Columbia Drive Property
Decatur, Georgia

Dear Mr. West,

On behalf of East Decatur Greenway (EDG), I am pleased to submit the enclosed brownfield cleanup application for the 890 Columbia Drive property located in Decatur, Georgia. East Decatur Greenway is a 501(c)3 non-profit corporation whose mission is "to create community greenspace, remediate environmental contamination, and build safe trails for bicycling and walking in this densely populated part of DeKalb County."

The 890 Columbia Drive property is a one-acre plot of land that has caused concern and distress in our neighborhood. Originally developed as a gasoline station in the 1940s, the property operated as such until it was abandoned in 1999 and was left to deteriorate. The property had become overgrown with kudzu, the subject of vandalism, and a haven for illicit activities.

In the true spirit of a grassroots campaign, residents who were interested in promoting a walkable community and upset with the state of this run-down property (and the owner's unwillingness to address its visual and environmental problems) took action. We formed East Decatur Greenway (EDG) in 2011, and have been working with City, County, State, and Federal agencies, the PATH Foundation, and the community to acquire the property and obtain funding for its eventual redevelopment as a greenspace.

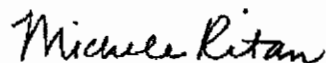
Working with the neighborhood associations and others interested in promoting alternate forms of transportation, EDG has developed a collective vision for this underutilized parcel. This vision includes a community greenspace that could be shared by the adjacent and nearby schools as an outdoor classroom with the bordering creek as a learning station; by the community with the construction of a trailhead for a multiuse bicycling/pedestrian path that would connect the property to the Avondale MARTA station; and by other outdoor enthusiasts who could utilize the trails for exercise and fresh air. However, the community's best efforts to link their homes to the educational, transportation, and recreational opportunities afforded by reuse of the property will be lost if the site is not first cleaned up. As such, the EDG is requesting \$196,000 from the EPA to continue cleanup activities at this property. EDG is requesting a waiver of the 20% cost share.

Previous environmental assessment activities at the property revealed that soils are contaminated with Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) and what is believed to be a small amount of free-phase petroleum product in the groundwater, making it a potential health threat to nearby neighborhood

residents and school children and inhibiting the redevelopment of the property. Specific redevelopment plans are in place with available funding if clean up of the property occurs. It is our hope that the EPA will assist EDG in completing the redevelopment of this property by funding this cleanup proposal.

Thank you for your consideration of this grant application. We look forward to hearing from you soon. We are committed to the success of this project and the continued redevelopment of brownfield sites within our community. If you have any questions, please feel free to contact me at (404) 259-5338.

Sincerely yours,



Michele Ritan
Director, East Decatur Greenway Inc

cc: Cindy J. Nolan, Region IV EPA

- a. **Applicant Identification:**
East Decatur Greenway
Post Office Box 2316
Decatur, Georgia 30031
- b. **DUNS Number:** 07-925-7768
- c. **Funding Requested:**
 - i): Grant Type: Cleanup
 - ii): Federal Funds Requested: \$196,000; requesting a cost share waiver
 - iii): Contamination: Petroleum
- d. **Location:** Decatur, Dekalb County, Georgia
- e. **Property Name:** 890 Columbia Drive Property, 890 Columbia Drive, Decatur, Georgia 30031
- f. **Contacts:**

| | |
|--------------------------------------|---|
| i) Project Director | ii) Head of Organization/Chief Executive: |
| Michele Ritan, Director | Michele Ritan, Director |
| East Decatur Greenway | East Decatur Greenway |
| PO Box 2316 | PO Box 2316 |
| Decatur, GA 30031 | Decatur, GA 30031 |
| Phone: (404) 259-5338 | Phone: (404) 259-5338 |
| Fax: none | Fax: none |
| Email: eastdecaturgreenway@gmail.com | Email: eastdecaturgreenway@gmail.com |
- g. **Date Submitted:** January 22, 2014
- h. **Project Period:** October 1, 2014 – September 30, 2017
- i. **Population:**
 - i. 19,335*, City of Decatur; 1,575, Census Tract 229, East Decatur Neighborhood

*American Community Survey 2012 5-year estimate data

1. COMMUNITY NEED

a) Targeted Community and Brownfields

i. Targeted Community:

Incorporated on December 10, 1823, Decatur, Georgia is the second oldest municipality in the Atlanta metropolitan area. The seat for DeKalb County, it adjoins Atlanta's city limits six miles east of Atlanta's central business district. Historically, Decatur touted itself as 'a quiet, prosperous, small town which offered a peaceful, healthful, and beautiful place to live'¹ in comparison to the rapid growth occurring in nearby Atlanta. Over time, Decatur grew to become a popular suburb of the sprawling Atlanta metropolis, primarily due to the invention of the automobile. With the freedom to commute to and from jobs in the city, the middle class was able to move out of the urban landscape and into the idealized world of suburbia. Goods and services, schools, and eventually jobs added to this exodus – and eventually, Decatur grew to become what was called a "garden suburb." Here, families could purchase homes with larger lots with room for private backyards, garages, and driveways. And as the private automobile fueled growth and expansion, the local filling station and auto repair shop fueled and maintained the automobile. Small filling stations popped up across the city to meet the growing demand, often times immediately adjacent to homes, schools, and churches.

And this is where our story begins - at 890 Columbia Drive - a small, one-acre plot of land, whose history has caused a multitude of problems. Originally developed as a gasoline station in the 1940s with a convenience store added by the early 1970s, the property operated as such until it was abandoned in 1999. During its 50-year tenure, the locally owned 'mom and pop' station served the surrounding Forrest Hills neighborhood's growing need for vehicle fuel and repairs.

The mid-1970s brought a shift to the way transportation was considered in Decatur when the Metropolitan Atlanta Rapid Transit Authority, or MARTA, came to the small city. The construction of a MARTA station in the heart of downtown Decatur expanded the potential for public transit. Recent thinking has expanded on this idea, coining the term 'Walkable Urban Places' or 'WalkUPs' for communities such as Decatur, where alternatives to automobiles can be promoted. East Decatur Greenway's proposed redevelopment will allow more people to move safely between neighborhoods, rapid transit, churches, and schools without the use of automobiles. Redeveloping 890 Columbia Drive into a trailhead to provide a connection to the Avondale MARTA station will give walkers and cyclists easy access to downtown Decatur and its shopping, restaurants, medical facilities, and services, thus supporting the local economy. Safe multiuse trails promote the health of adults and children by providing safe places to exercise, play, and connect with others.

In the 1970s, as in many parts of the country, Decatur saw a decline in "mom and pop" businesses. The small shop/ gas station at 890 Columbia Drive changed ownership and names several times throughout its operation, starting as Columbia Drive Service Station, then Pilot Oil Corporation, then the Little Mart Gas Station, and finally a Speed Trip Gas Station when it closed in 1999. Nasrudin Sayani became the owner, and the gas station/convenience store was left abandoned to deteriorate. Mr. Sayani never operated at the site. Instead, the site became overgrown with kudzu, the subject of vandalism (graffiti) and a haven for illicit activities.

In response, the residents of Forrest Hills, the adjacent subdivision built in the late 1940s, began an unsuccessful campaign in 1999 to work with Mr. Sayani to address the unsightly state of the property. Unfortunately, the owner remained uncooperative and unhelpful and refused to address the issues.

In the true spirit of a grassroots campaign, residents who were concerned about environmental contamination on the property that was unfenced and easily accessible to their children, who were equally

¹ "Historic Decatur." *City of Decatur* : N.p., n.d. Web. 27 Dec. 2013.

interested in promoting a walkable community, and who were upset with the state of this run-down property (and the owner's unwillingness to address its visual and environmental problems) took matters into their own hands. They formed East Decatur Greenway (EDG), a 501(c)3 non-profit organization, with the mission to 'create community greenspace, remediate environmental contamination, protect the watershed, and build safe trails for bicycling and walking in this densely populated part of DeKalb County. Founded in 2011, EDG has been working with multiple agencies to acquire the property and obtain funding for its eventual redevelopment as a trail head for a walking/biking path to the Avondale MARTA Station and a neighborhood greenspace that can be utilized by the neighborhood schools for environmental education. After a long and arduous process, EDG finally took title to the former gas station property via a DeKalb County Sheriff's Deed in November of 2012.

ii. Demographics:

Located in the Forrest Hills neighborhood with Midway Woods neighborhood nearby, the EDG site is in an area that has a higher minority population, a higher percentage of women in child bearing years, a lower median household income, a higher unemployment rate, a lower median home value, and a greater vacant housing unit percentage than the City of Decatur. Also, this neighborhood has a slightly higher number of elderly than the City of Decatur and a significantly higher number of elderly than DeKalb County and the State of Georgia. The 15.4% of children in the neighborhood does not include those who attend school next door to or nearby this site. The enrollment of the Friends School of Atlanta (next door) and of the nearby Museum School and Waldorf School adds approximately 700 children to the immediately vicinity of the site each school day.

East Decatur Demographics

| | East Decatur Neighborhood (Census Tract 229) | City of Decatur | DeKalb County | State of Georgia | United States |
|------------------------------|---|-----------------|---------------|---------------------|---------------|
| Population | 1,575 | 19,335 | 694,671 | 9,714,569 | 309,138,711 |
| % Minority (Black) | 26.7 | 20.2 | 54.5 | 30.6 | 12.6 |
| % Women of Child Bearing Age | 38.9 | 25.3 | 45.3 | 14.9 | 39.9 |
| % Elderly | 11.5 | 11 | 9.1 | 10.7 | 13.2 |
| % Children | 15.4 | 25.1 | 26.7 | 28.7 | 26.9 |
| Median Household Income | \$72,689 | \$101,752 | \$51,252 | \$49,604 | \$53,046 |
| Unemployment Rate | 9.6 | 6.4 | 9.3 | 6.9 | 6.5 |
| % Poverty | 10.5 | 14.6 | 18.6 | 17.4 | 14.9 |
| Median Home Value | \$225,200 | \$340,300 | \$178,000 | \$156,400 | \$181,400 |
| % Vacant Housing Unit | 16.1 | 7.9 | 13.3 | 14.1 | 12.5 |

Source: US Census Bureau, 2012 5-year ACS Survey Estimates, www.census.gov, accessed November 2013.

iii. Brownfields:

The EDG site is a former gas station that operated for 50 or more years (1940s to 1999). At some points in its history, the gas station also served as an automobile service/repair station. The rundown appearance, attracting vandals and vagrants to this unfenced site, was the initial concern of the community, but the site's operation as a gas station for so many years quickly became a significant focus. Research on the site revealed that in 1997, prior to Mr. Sayani's ownership, a formal gasoline underground storage tank (UST) release notification was submitted to the Georgia Environmental Protection Division (GAEPD) acknowledging that a gasoline release had occurred at the property. In return, GAEPD issued a receipt of acknowledgement, and requested that a Corrective Action Plan, Part A (CAP-A) be submitted to address the release. However, neither the owner prior to 1999 nor Mr. Sayani responded, which prompted GAEPD

to issue a notice of violation in 2005. Again, the owner did not respond, and GAEPD did not pursue further action.

In 2012, after many years of effort, the purchase of a judgment lien, and a sheriff's sale, EDG, formed to acquire this property and get it cleaned up in order to create an asset to the community, accomplished its first goal of property acquisition. A Phase I ESA was conducted on the property, which found Recognized Environmental Conditions (RECs) including the past release of petroleum with no evidence of corrective action and suspected asbestos containing materials (ACM) in the convenience store building.

EDG requested assistance from EPA Region 4's Targeted Brownfields Assessment (TBA) Program. Under this program, EPA's contractor conducted both Phase I and Phase II ESAs on the property and prepared an Analysis of Brownfields Cleanup Alternatives (ABCA) comparing cleanup alternatives by effectiveness, reliability, implementability, and cost. The TBA Phase I confirmed the findings of the earlier Phase I with the following RECs: reported petroleum releases in 1995 and 1997; presence of three 8,000 gallon underground storage tanks (USTs), and suspected ACM on the exterior and interior walls of the building (former convenience store).

The Phase II work included the following: an asbestos survey of the building which confirmed the presence of ACM; the abatement of asbestos in the building; the demolition and off-site disposal of the building in order to collect samples beneath it; and, the removal and proper disposal or recycling of three USTs, 75 feet of associated product piping, two dispenser islands, and 318 cubic yards (cyd) of petroleum contaminated soils around the UST system. Twenty soil samples and seven groundwater samples were collected from the site. Additionally, three sediment and three surface water samples were collected from the East Fork of the Middle Branch of Shoal Creek Waterway (Shoal Creek) that borders the property boundary. Twelve of the 20 samples had benzene contamination at levels greater than GAEPD Brownfields Program's Risk Reduction Standards (RRS). Seven of the soil samples found ethylbenzene at levels greater than RRS, and three of the samples found toluene above the RRS. Of the three temporary wells that were installed, one contained free product and the other two had exceedances of RRS for all Benzene Toluene Ethylbenzene Xylenes (BTEX) constituents. Four out of five of the permanent wells (installed during a previous investigation) sampled found benzene greater than RRS. Ethylbenzene exceeded RRS in two wells, and toluene and xylenes exceeded the RRS in one well. Additionally, toluene was detected in the downstream sediments of Shoal Creek, but an EPA Region 4 Sediment Screening Level is not established for toluene. Even after the removal of 318 cyd of petroleum contaminated soils from the site, there is still substantial contamination of the soils with no means of preventing exposure.

iv. Cumulative Environmental Issues:

Many other closed and abandoned buildings are located near the site, including at least six vacant buildings and two strip centers with multiple vacancies within a 1.5 mile radius. Decatur is a small city geographically, only 4.2 square miles, but it is one of the densest, with 28 residents per acre. Single occupancy vehicle use is still the major form of transportation, so the decrease in automobile use is much needed.² The average air quality index from 1999-2009 was continually and consistently worse in Decatur than in Georgia and the United States. The average total suspended particulates, nitrogen dioxide, ozone, and particulate matter in Decatur were higher than Georgia and the United States in each of the ten years. As the Air Quality Index increases, an increasingly larger percentage of the population is likely to experience health effects.³ While EDG does not know if our neighborhood is being impacted by environmental contamination beyond that at 890 Columbia Drive, we do know that we must deal with the health effects of smog and particulate contamination of our air.

² <http://www.decaturga.com/Modules/ShowDocument.aspx?documentid=1695>

³ <http://www.usa.com/decaturn-ga-air-quality.htm#epaaqi>

b) Impacts on Targeted Community

Historically, the Forrest Hills neighborhood has been a desirable place to live. In addition to our homes, several schools and churches are also located in this area. For example, immediately adjacent to the former gas station at 890 Columbia Drive is the Friends School of Atlanta, the state of Georgia's only elementary-through-middle Quaker school. The Friends School opened in Decatur in 1991, and moved to its current location adjacent to the target property in 1998. The unfenced former gas station remains a hazard to school children who may easily trespass on the property as they walk to and from school. Further, the natural buffer of trees and woodlands separating the school's parking lot from the former station's canopy and dispenser islands is a natural play place for children to wander and explore, never suspecting they are coming in contact with petroleum hydrocarbons such as the benzene, toluene, and ethylbenzene documented to exist in the property's surficial soils. Shoal Creek runs behind the Friend's School and borders the old gas station site, providing another contaminated attraction (toluene was detected in a downstream sediment sample) to for children to discover.

The Waldorf School of Atlanta, another pre-school through middle school institution, is also located in the area, diagonally across the street from the Friends School and the former gas station property. Children from this school are also at risk to exposure to the petroleum hydrocarbons found in the site's soils due to the proximity of the site to the school and the natural curiosity of children to explore. And, immediately adjacent to the Waldorf School is the Columbia Theological Seminary (CTS) – yet another institution of learning whose students and their families could be affected by the former station located in its midst. (CTS has extensive housing on campus for families, since many students are married with children.) Further up Columbia Drive is the United Methodist Children's Home, where around 100 children, youth, and families are served in the Home's residential services. Columbia Presbyterian Church is also located along Columbia Drive, immediately across the street from the Friends School and diagonally from the former gas station. Parishioners and their children are also at risk to exposure. Immediately adjacent to Columbia Presbyterian Church is Our House, a unique childcare and support center for homeless families. Children here are also at risk from environmental contamination.

In addition, three private homes share a property boundary with the former station, bisected by the Shoal Creek waterway, and two private homes are located immediately across Columbia Drive from the station. All of the people in these homes and schools have easy access to the unfenced property with documented soil contaminated from petroleum hydrocarbons exceeding Georgia RRS. There is an elevated risk of exposure to these contaminants via the dermal, inhalation, and ingestion pathways for residents, the neighborhood children, and those attending the adjacent and nearby schools.

Nearly 39% of the women in the census tract here are of child-bearing age, and are especially sensitive to benzene (which causes premature births and miscarriages). More than 15% of the population in this census tract is children under the age of eighteen, who are also especially sensitive to benzene which has recently been found to increase the rate of childhood leukemia. Also, the Center for Disease Control reports in its *Facts About Benzene*, "The air around hazardous waste sites or gas stations can contain higher levels of benzene than in other areas."⁴ For fifty years, those in proximity to 890 Columbia Drive have been breathing air that has higher levels of benzene.

In addition to these direct health and environmental impacts are the emotional impacts felt by those living in the Forrest Hills and surrounding neighborhoods. The gas station was logically constructed along a major

⁴ <http://www.bt.cdc.gov/agent/benzene/basics/facts.asp>

thoroughfare through the neighborhoods. From 1999 until mid-2013, the site was a constant eyesore to those in the community who drove by it – but worse – to those who viewed it every day from their homes.

The site appearance has improved since EDG successfully applied for an EPA Region 4 Targeted Brownfields Assessment Funds, which removed the UST system and graffiti-laden convenience store. While EDG has paid a landscaping service to control the overgrowth, the site remains an environmental hazard

c) Financial Need

i. Economic Conditions:

East Decatur Greenway (EDG) was formed to address this particular problem. EDG is a 501c(3) non-profit organization with limited resources and no source of income other than donations. The bank account balance for EDG is \$6,555.13 as of January 2, 2014. While EDG has had one major benefactor whose donation allowed it to acquire the property, the total other community donations has been \$670.00. EDG does have a commitment from the PATH Foundation to redevelopment the property once it is cleaned, but we do not have the financial resources to conduct the cleanup.

EDG receives no operating funds from the City of Decatur or DeKalb County. As noted in the demographic table, the East Decatur neighborhood (outside of the Decatur City limits but referred to as East Decatur) is not as affluent as the City of Decatur. 890 Columbia Drive is not within the city limits of Decatur, so the City has no obligation to assist with this project. The City may assist with the portion of the proposed bicycle/walking trail that will go through the city limits. DeKalb County has shown interest in this problem, but has little funding for parks and greenspace. Prior to forming EDG, the Forrest Hills Neighborhood Association asked the County if it would consider taking title to the property. The County refused, citing limited funding and no funds for environmental cleanup. Thus, the neighborhoods proceeded with the formation of EDG to address this problem site.

ii. Economic Effects of Brownfields:

While it is difficult to document that the vacant and blighted gas station has had an impact on adjoining commercial and residential property values, there is considerable concern among residents about a negative effect on property values. This issue has been a topic of discussion at many Forrest Hills Neighborhood Association Meetings. As the demographic table shows, the median home value in the East Decatur Neighborhood is significantly less than those in the adjacent City of Decatur. This may be explained by a study published in 2013, which found that for each 1 percent nearer to a brownfield a residential property stood, the value of the house depreciated nearly 0.1 percent (one tenth of one percent). Conversely, a 1 percent increase in distance from the closest brownfield corresponded to a nearly 0.1 percent (one tenth of one percent) increase in market value.⁵ Considering the subject site is in close proximity to the neighborhood, the impact on property values may be significant. Real estate agents are applauding the efforts of EDG, and their actions are a telling indicator of the site's impact on property values. Agents have reported to EDG that when trying to sell a home in the neighborhood, they try to route potential buyers from the other direction so they will not see 890 Columbia Drive.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a) Project Description

i. Existing Conditions - The former gas station property located at 890 Columbia Drive is currently vacant, idle, and underutilized. In anticipation of a real estate transaction in 2007, a Phase II Environmental Site

⁵ Mihaescu, Oana, Vom Hofe, Ranier (2013) Using Spatial Regression to Estimate Property Tax Discounts from Proximity to Brownfields: A Tool for Local Policy-making. The Journal of Environmental Assessment Policy Management, 15(1)

Assessment was completed at the property on behalf of the prospective purchaser. Soil and groundwater samples were collected during the Phase II ESA that documented the presence of benzene, toluene, and ethylbenzene at levels exceeding GAEPD UST soil and groundwater standards. The environmental contamination found at the property effectively halted the transaction from going further. Following the transaction that fell through, EDG began taking steps to acquire the property. EDG submitted a Prospective Purchaser Corrective Action Plan (CAP) and an application for approval as a brownfield site to the GA EPD under the Georgia Hazardous Site Reuse and Redevelopment Act. On December 12, 2011, GA EPD approved the application and Corrective Action Plan and confirmed that the site met the Brownfields qualifying criteria established under the Act.

EDG took title to the property via a Sheriff's Deed in November of 2012. EDG contacted Region 4 EPA for assistance with the assessments required as part of the CAP. In January 2012, the EPA-funded TBA began. Confirming the presence of USTs on site and the presence of suspected ACM in the building, EPA proceeded with a Phase II ESA that included the removal of the USTs, dispenser islands, and associated piping as well as the demolition of the convenience store building to allow for sampling beneath the structures; thus, no buildings currently exist on the property. Also, twenty soil samples and seven groundwater samples were collected from the site, and three sediment and three surface water samples were collected from Shoal Creek that borders the property boundary. Many of the soil samples and all but one of the groundwater samples contained petroleum constituent contamination above GA's RRS. Free-phase petroleum product (0.25") was also found in one of the temporary monitoring wells installed as part of the assessment; however it was only found in one well, so it was assumed to be limited to one area of the property.

In addition, sediments sampled from the adjacent creek also showed detectable levels of toluene and total petroleum hydrocarbons-gasoline range organics (TPH-GRO). A draft Analysis of Brownfields Cleanup Alternatives (ABCA) was completed in May 2013 and amended in January 2014. It was placed on public notice on January 10, 2014.

However, remediation of the free-phase petroleum product at the property and the wide-spread soil contamination has not and cannot be completed without additional funds.

The planned redevelopment for the property is part of a larger project that will benefit the entire eastern Decatur area. The community longs for the now idle and contaminated property to be transformed into a trailhead that will link the neighborhood to public transit, businesses and services, safe routes to schools, connections with other greenspaces, and access to churches and neighborhoods.

A cleanup will directly create a water quality improvement in the stream (which is receiving contaminants from the UST leakage). The greenway will promote a larger community connection with the stream, ultimately leading to a cleaner waterway and a healthier community. Communities tend to care for streams they see and engage with, and a community-driven clean-up will introduce the community to better stewardship and cleanup methods for streams. EDG plans to work with several local schools to adopt the stream, thus educating the next generation about the importance of protecting natural waterways.

EDG has been instrumental in facilitating the redevelopment of this area. Working with the Forrest Hills Neighborhood Association, the Midway Woods Neighborhood Association, Columbia Residential, East Decatur Station, and the PATH Foundation, a collective vision has formed for this underutilized parcel. This vision includes a community greenspace that can be shared by the adjacent and nearby schools as an outdoor classroom with the bordering creek as a learning station. In addition, the construction of a trailhead for a multiuse bicycling/pedestrian path will enable residents to reach the Avondale MARTA station without driving, and other outdoor enthusiasts can utilize the trails for exercise and fresh air.

EDG has partnered with the PATH Foundation to bring vision to reality. PATH has developed over 180 miles of trail throughout Georgia, becoming a nationally recognized model for trail-building success. PATH's linear parks, such as that proposed for this property, have become part of the landscape in both urban and rural areas, bringing people together from all races, ages, income levels, and cultural backgrounds. PATH has already expended \$15,000 in engineering, design, and consultant fees and many, many hours of staff time to advance the proposed trail project through the planning stage. Furthermore, PATH has agreed to construct the trail utilizing public and private funding in the amount of \$750,000. A letter of support is included. However, the investments thus made and committed in the future cannot occur until the site is remediated and safe for the future intended reuse.

ii. Proposed Cleanup Plan

EDG acquired the 890 Columbia Drive property and is now ready to undertake the environmental remediation of the site once funding can be obtained. EDG plans to redevelop the site for community greenspace, with the primary focus as a trailhead for an urban greenway linking the surrounding neighborhoods to the Avondale MARTA station and an environmental education classroom for the neighboring schools.

An Analysis of Brownfields Cleanup Alternatives was prepared as part of the EPA Targeted Brownfields Assessment in May 2013. A January 8, 2014, letter addendum to the ABCA was prepared by Cardno, Inc. to include another alternative that will address free product removal and is less expensive but effective. Thus, a total of five options for remediation were reviewed, including the estimated costs, to address the property. These options included no action, monitored natural attenuation, soil excavation and removal, soil vapor extraction and air sparging, and free product removal with multi-phase extraction. Of the five options evaluated, free product removal with multi-phase extraction was selected as the preferred remedy. Because the on-site soil contamination has remained contaminated more than 15 years after the UST leak was reported, it is unlikely that monitored natural attenuation will suffice. Soil removal does not address free product removal and is difficult to perform in close proximity to the creek because of wetlands issues. Air sparging and soil vapor extraction are effective remedial technologies in treating dissolved groundwater contaminants, but they are not very effective at addressing the free-phase petroleum product. Thus, the most effective and efficient method is free product removal with multi-phase extraction (MPE). The free product removal with MPE is estimated to cost approximately \$135,000.

b) Task Description and Budget Table:

Task Descriptions

EDG plans to complete the following specific tasks with the proposed budget:

Task 1 – Community Outreach: We are budgeting \$19,500 for contractual expenses related to community outreach, education, and involvement activities as outlined below. The selected consultant will present at regular community meetings with the various neighborhood associations and groups, including but not limited to the Forrest Hills Neighborhood Association and the Midway Woods Neighborhood Association. The consultant will assist EDG with issuing public notices and newspaper articles to keep the local community informed of environmental cleanup activities and results. Also, the consultant will make presentations at the four neighborhood schools to educate the students on the environmental aspects of the project and introduce them to careers in the environmental sciences.

Costs associated with community involvement activities planned for the project include:

- Public Involvement Plan – that will outline outreach activities (\$2,500)
- Presentations at Neighborhood Association Meetings to include preparation of power point presentations and information sheets ~ quarterly (\$5,000)

- Presentations at four neighborhood schools to educate the students on environmental aspects of the project (\$6,000)
- Community Meetings (at least two – one before remedial work begins and one after remedial work to share results) (\$3,000)
- Preparation, Printing, and Distribution of Project Brochure (\$2,500)
- Public Notices (\$500)

EDG plans to update its Facebook page, the medium that the community knows and uses to access information about the project, with grant information and progress. At this time, EDG's Facebook page has over two hundred supporters. This work will be performed as in-kind services as will other community outreach efforts such as attending meetings and maintaining an information repository.

In addition to the contractual costs outlined above, EDG is requesting funds for travel (\$3,000) and supply (\$1,500) expenses under this grant application. Travel funds will allow EDG representatives to attend regional and national EPA Brownfield conferences as well as other relevant workshops and training associated with sustainable redevelopment of brownfield properties. Supply funds will allow EDG to purchase supplies needed to support community outreach, such as printing conceptual renderings and maps.

Task 2 – Cleanup Planning: Cleanup planning will include finalizing the ABCA document, preparing the Quality Assurance Project Plan(s) for confirmation soil sampling, preparing the Health and Safety Plan, revising the GA Brownfields CAP and getting approval of the modification, conducting a Natural Resources/Endangered Species Study, and developing the bid documents for site cleanup activities, evaluation of bids, and selection of contractor. Cleanup planning costs are anticipated to be \$19,000 and include the following:

- Finalization of ABCA document, including incorporation of comments from public notice and regulatory review (\$2,500)
- Preparation of a Quality Assurance Project Plan, Confirmation Sampling Plan, and Health and Safety Plan (\$6,000)
- Revising the GA Brownfields PPCAP (\$3,000)
- Natural Resources/Endangered Species Study (\$3,000)
- Development of bid documents for site activities, evaluation of bids, and selection of contractor (\$4,500).

Task 3 –Site Cleanup: We will use the majority of the grant funds for the actual site cleanup activities which is estimated to cost \$157,000. Based on the Phase II ESAs of the property, the proposed remedy included in the draft ABCA as amended by letter of January 8, 2014, we plan the following remedial activities:

- Conduct free product removal by MPE with enhanced aerobic bioremediation – three MPE events, two enhanced aerobic bioremediation injections (\$135,000)
- Oversight of free product removal and enhanced aerobic bioremediation work (\$15,000)
- Collect and analyze 10 samples for confirmation sampling. Approximately 10 confirmation samples will be analyzed for BTEX, PAHs, and lead. The confirmation samples will be analyzed for total TAL metals, SVOCs, and VOCs. (\$7,000).

In summary, the total cost of project activities is estimated to be \$200,000. Due to EDG's limited resources, we are requesting a waiver of the 20% match. EDG personnel time to administer the grant will be in-kind, leveraged work.

890 Columbia Drive Cleanup Proposed Budget Table

| Budget Categories <i>(programmatic costs only)</i> | Project Tasks | | | |
|--|------------------------------|----------------------------|-----------------------------------|------------------|
| | Task 1 Community Outreach | Task 2 Cleanup Planning | Task 3 Site Cleanup Activities | Total |
| Personnel | | | | |
| Fringe Benefits | | | | |
| Travel | \$3,000 | | | \$3,000 |
| Equipment | | | | |
| Supplies | \$ 1,500 | | | \$1,500 |
| Contractual | \$19,500 | \$19,000 | \$157,000 | \$195,500 |
| Other (specify) | | | | |
| Total | \$24,000 | \$19,000 | \$157,000 | \$200,000 |
| EPA Share | \$24,000 | \$19,000 | \$157,000 | \$200,000 |
| EDG Share | Waiver requested | Waiver requested | Waiver requested | Waiver requested |

c) Ability to Leverage:

EDG is financially committed to the redevelopment of the former 890 Columbia Drive gas station site and has expended \$5,887.50 to perform a Phase I ESA, to prepare the CAP for the GA Brownfields Program, and to pay the GA Brownfields Program application fee. In addition, the EDG director has spent approximately 1,440 hours of her time volunteering to this problem site (an estimated \$93,600 value). Also, it is estimated that other volunteers including EDG Board members, community advisors, and others have given at least 200 volunteer hours to this project. The community is very dedicated to getting this site remediated and redeveloped as evidenced by their volunteer support.

Initial costs for the redevelopment of the site into the trailhead and trail linking South Decatur to the Avondale MARTA station are estimated to be \$750,000. As noted in Section 2, Project Description, the PATH Foundation has not only contributed to the planning of the project but has committed to seeing it come to fruition. The enclosed leveraging letter from Ed McBrayer, Executive Director of the PATH Foundation commits \$750,000 in public and private funding to this effort. It is anticipated that PATH will directly contribute \$350,000. The City of Decatur may assist with the portion of the biking trail from the trail head at 890 Columbia Drive to the Avondale MARTA station that runs through the City limits, estimated at \$100,000. DeKalb County is proposing to assist with concrete pavement that is estimated at \$100,000. A vote of the DeKalb County Commissioners on this \$100,000 effort is anticipated within a month. Also, a private donor, a bicycling enthusiast, is willing to contribute \$200,000 to accomplish this redevelopment if the site is cleaned up. A leveraging letter is included. The partner schools, The Friends School, the Waldorf School, and the Museum School have verbally indicated that they will fund a significant portion of the redevelopment into an educational classroom.

To help realize the end vision of a community greenspace with sufficient space to house the trailhead and room for an educational outdoor classroom/open space, several adjacent parcels are slated to be donated upon completion of the site remediation. Charles E. Bosserman owns several small parcels adjacent to 890 Columbia Drive and has provided a leveraging letter, which is included as an attachment, for the donation of property. All together, these parcels will create over two acres of land that can be used by the adjacent schools, neighborhoods, churches, and other residents of the area.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a) Plan for Involving Targeted Community & Other Stakeholders & Communicating Project Progress:

The former gasoline filling station is located just outside the Decatur City's limits and within DeKalb County. Residents of the surrounding Forrest Hills and Midway Woods neighborhoods are proactive in working to improve their surroundings. The grassroots dedication of these organizations is evident in that they have taken every step possible to remediate this derelict piece of property: creating EDG; enduring the arduous process for EDG to take ownership of the property; seeking EPA Region 4 assistance to assess the property, remove the tanks, abate the asbestos, and demolish the building; and now applying for this cleanup grant. The demonstration of their strong desire to community improvement cannot be doubted. They are highly organized, active, and effective organizations as evidenced on their websites, <http://forresthillsneighborhood.org/fhna/> and <http://www.midwaywoodsneighborhood.com/>.

These organizations and the surrounding schools, churches, and several nonprofit organizations are the core community. They have been engaged for years, and will continue to communicate with others in the community who cannot attend meetings. EDG plans to present updates on the project at the neighborhood associations at least once a quarter. Both organizations post their minutes on their websites. The bottom line is that neighborhood groups are working together to get this property cleaned up and to improve their community.

Further, EDG plans to present the work that is done at the site to the Friends School, the Waldorf School, Our House, and The Museum School as an environmental education program for science classes. These presentations will not only teach about environmental cleanup but also will introduce the students to careers in the environmental field.

As such, the project team will utilize the neighborhood associations and schools to disseminate and gather information. In addition to presentations at neighborhood association meetings, EDG will conduct at least two full community meetings to advise the community on the cleanup. The first will be held prior to the physical work on the property begins to explain planned cleanup activities and address any concerns, and the second will be held after the work is complete to report the findings. At these meetings, EDG will have appropriate personnel – consultants, County officials--to answer questions. Also, the Project Team will be available to meet with property and business owners near the site and the neighborhood communities surrounding the site to address their concerns on an as-needed basis. The Project Team will also communicate through the preparation and distribution of a project brochure and information sheets about the environmental cleanup. Plus, the EDG Director maintains a Facebook page, <https://www.facebook.com/EastDecaturGreenway>, which will be updated regularly with notices and documents about the cleanup project. At this time, the EDG Facebook page has over 200 followers. An information repository will also be housed at East Decatur Station, 111-C New Street, Decatur, Georgia 30030, a publicly-accessible business location that is 1.33 miles from the site.

A public notice was printed in the local newspaper, *The DeKalb Neighbor*, on January 8, 2014, announcing EDG's intention to submit this EPA Brownfield Cleanup Application and the availability of the draft ABCA application. The notice invited community members to attend a public meeting on January 9, 2014 at 6:30 pm at the Columbia Presbyterian Church, 711 Columbia Drive, Decatur GA. The meeting announcement was also posted on EDG's Facebook page. At the January 9th meeting, individuals associated with the cleanup were present and the proposed cleanup method discussed. A meeting summary is included with the Threshold Criteria. The community was given the opportunity to review the draft ABCA and draft application and to provide input and comments. Attendees were reminded how to become and stay involved in the project. The public notice (along with the meeting sign-in sheet) is included with the Threshold Criteria.

Given the very low Hispanic population in the area, we do not anticipate the need for a Spanish translator at public meetings. However, one will be provided should the need arise. Assistance will also be made

available to those persons with physical disabilities to be able to participate in project-related meetings (such as holding meetings at locations that are handicap accessible). EDG will also work closely with its community-based partners, collaborative partners, and other contacts to ensure that communication messages reach all constituent groups.

During the actual environmental cleanup, nearby and sensitive populations throughout the community (such as those living immediately adjacent to the property and the neighboring school children) will be protected from contaminants utilizing standard safety features. Environmental consultants working on the site will be briefed prior to initiating work to let them know of the close proximity of homes and schools. The free product removal by MPE and enhanced aerobic bioremediation will be handled by injection into the subsurface, so there should be little if any exposure hazard to the community. However, appropriate measures, such as signs and/or barricades, will be posted and watering of soils/dust will occur, if needed. As part of the community involvement, a community meeting will be held prior to the beginning of remediation to educate the surrounding community on the process and effects of brownfield cleanup at the former gas station site and to address their concerns.

b) Partnerships with Government Agencies:

EDG has been working with GA EPD staff since 2011 to address the environmental concerns associated with the 890 Columbia Drive site. Ms. Madeleine Kellam, Brownfields Coordinator for the GA EPD, supports this application as is evidenced by her letter that is included with the Threshold Criteria. Also, enclosed is a letter from Ms. Kellam providing GA's determination that this site is eligible to apply for an EPA Brownfields Petroleum Grant. GA EPD has pledged to continue their oversight of cleanup activities under the established CAP.

Georgia Department of Public Health, DeKalb District will be requested to provide a professional staff member to serve as a resource to answer questions concerning the impacts of petroleum constituents and the importance of their remediation for the community.

c) Partnerships with Community Organizations:

The community formed EDG to acquire 890 Columbia Drive and get the site cleaned up for the nearby neighborhoods. The site is in the Forrest Hills Neighborhood. The Forrest Hills Neighborhood Association will regularly host members of the Project Team at its meetings to report on the cleanup progress. The Association will continue to disseminate information through its website and by its members sharing the good news of the cleanup. A letter of support is included.

The Midway Woods Neighborhood is near the site and has been supportive of the formation of EDG and the acquisition and cleanup of the site. The Midway Woods Neighborhood Association will regularly host members of the Project Team at its meetings to report on the cleanup progress. The Association will continue to disseminate information through its website and by its members sharing news of the cleanup. A letter of support is included.

The PATH Foundation forms partnerships with local governments to build greenway trails by providing staff to plan, design, build and maintain trail projects. In some cases, PATH provides matching funds to finance the development of trails. Local governments provide access to state and federal funding, rights-of-way for trails, and in-kind services during trail development. PATH has already contributed \$15,000 in consultant fees and many hours of time to the planning of this project. Further PATH is prepared to construct the trail during 2014 utilizing public and private funding of \$750,000. A letter of support is included.

Letters of support from these organizations are included as attachments. Summaries of the key organizations are provided below.

| Organization | Purpose of Organization | Description of Support |
|--|---|---|
| Forrest Hills Neighborhood Association | The purpose of the organization shall be to promote the best interests and welfare of the Forrest Hills Community. | Donate funds to EDG; volunteer to assist with landscaping; contribute plant material; host members of the Project Team to report on the cleanup progress. A letter of support is included |
| Midway Woods Neighborhood Association | The Purpose of MWNA is: to preserve the residential character of the neighborhood; to improve the quality of life for all residents of the neighborhood; to maintain a diverse community where neighbors of all ages, races, and economic levels can live together in harmony and fellowship; and to encourage and facilitate maximum participation by all residents in addressing neighborhood problems and needs. | Donate funds to EDG; volunteer to assist with landscaping; contribute plants and building materials and expertise from our residents. A letter of support is included. |
| PATH Foundation | A non-profit organization with the mission to develop a system of interlinking greenway trails through metro Atlanta for commuting and recreating. | Committed to the trail from a trail head at 890 Columbia Drive to the Avondale MARTA station during 2014 utilizing public and private funding of \$750,000. A letter of support is included. |
| Charles E. Bosserman | Community-based private entity | Will match the PATH Foundation funding up to \$200,000 for construction of the trail; will donate small adjacent parcels to EDG. Two letters of support are included. |
| Friends School of Atlanta | Our mission is to provide challenging academics in a diverse environment, drawing on the Quaker testimonies, or values, of simplicity, peace, integrity, community, equality and stewardship to empower our students to go out into the world with conscience, conviction and compassion. | Located directly adjacent to the site; will use the redeveloped site for an outdoor environmental education classroom; requested Project Team to present information on the cleanup of the site to their sciences classes. A letter of support is included. |
| Columbia Presbyterian Church | Church that is directly across the street from 890 Columbia Drive | Has provided meeting space and will continue to do so; some members have made financial contributions to EDG; members will be willing to assist in beautification efforts of the greenway. A letter of support is included. |
| The Waldorf School | The Waldorf School of Atlanta develops in its students the will to become life-long learners by fostering in each student the ability to think with clarity, feel with compassion, and act with purpose in the world. | Provide meeting space; contribute to landscaping efforts; Raise awareness of EDG's efforts and impact; work with EDG to reinforce environmental awareness |

4. PROJECT BENEFITS

a) Health and/or Welfare and Environment:

The former 890 Columbia Drive filling station site has documented free-phase petroleum product present in the subsurface, as well as soil contamination that has not been remediated. The environmental remediation (free product removal and enhance aerobic bioremediation) planned with these grant funds will help prepare the site for redevelopment. By addressing the soils which have been impacted since at least 1995 at this site, the health threats that the community residents and students have feared will be reduced and then eliminated. The air will be cleaner as the benzene level known to exist around gas stations is diminished. The creek will be allowed to recover when the soil contamination is eliminated and the groundwater quality improves. The groundwater will be cleaner, as the free product and contaminated soil sources are removed. For the past decade, residents of the Forrest Hills neighborhood have diligently worked to address this problematic piece of property located in the heart of their neighborhood.

Environmental cleanup of the former gas station will allow the community to realize their vision – a trailhead that will link the immediate area to the Avondale MARTA station via an urban greenway. Furthermore, the cleanup and redevelopment will provide an outdoor environmental education classroom for the Friends School, the Waldorf School, and the Museum School and a shared, community greenspace. This plan for the *equitable redevelopment* of the subject site is the result of committed citizens who came together for a common goal, and who are eagerly awaiting the next step. The community is already enjoying the benefits

of the progress made so far, since the work completed by the EPA during the targeted brownfields assessment was a tremendous step in improving the emotional health of the neighborhood. As the graffiti riddled plywood that boarded up broken windows was torn down and carted away, spirits were lifted. A collective sigh of relief could be heard when the former UST tanks and associated piping and dispensers were pulled from the ground and removed from the site. However, until the contaminants lingering in the soils are finally mitigated and are no longer an exposure threat to our community, the redevelopment cannot occur.

Upon completion of the cleanup, EDG and our partners are ready to create a greenway that will offer safe, off-street routes to public transit, businesses and services, as well as safe routes to schools. These efforts will promote the health of children and adults, and reduce the use and pollution from automobile traffic.

b) Environmental Benefits from Infrastructure Reuse/Sustainable Reuse:

i. Planning, Policies or Other Tools:

On June 4, 2012, Decatur adopted an Environmental Sustainability Plan which includes a commitment to protect and preserve natural resources, to maintain economic vitality, to support smart growth development, to create community, to support active living, and to provide opportunities to live, work and play. Decatur has an Environmental Sustainability Board, and one of Decatur's green initiatives is to conserve and improve its natural resources. The cleanup of 890 Columbia Drive will improve the natural resources of Decatur and will help revitalize the East Decatur neighborhood. By increasing the greenspace in a neighborhood that has only one pocket park, the redevelopment will provide more opportunities for an active lifestyle and playing. The redevelopment of this property into a trailhead for a walking/biking path to the Avondale MARTA station also provides more transportation choices to neighborhood residents.

To ensure proper planning for greenspaces, the Joint DeKalb County/Municipal Greenspace Program was created in 2001. Through this program, the DeKalb County government developed a broad-based approach to the protection and preservation of greenspace. More specifically, DeKalb County is rewriting the Land Development Code to enhance environmental protection by directly protecting stream valleys/floodplains. The cleanup and redevelopment of 890 Columbia Drive to lessen the impact on its bordering creek supports this County initiative.

ii. Example of Efforts:

A number of the Livability Principles of the Partnership for Sustainable Communities will be met with this proposed cleanup and redevelopment. The remediation and redevelopment of the former gas station located at 890 Columbia Drive into greenspace with a trailhead for a walking/biking path to the Avondale MARTA station provides more transportation choices for neighborhood residents, students of schools in the neighborhood, and parishioners of the neighborhood churches.

George Washington University's School of Business released a study in October 2013 that highlights Decatur's walkability as a model that promotes economic activity. In fact, the Walkable Urban Places study, written by Chris Leinberger, finds that "WalkUPs," will drive tomorrow's national real estate industry trends and the economy. From 1992 to 2000, roughly 13 percent of real estate investment in the region went into what he called "Current" and "Emerging" WalkUPs. From 2001 to 2008, that number doubled to 26 percent. And since 2009, it more than doubled again, reaching 60 percent.⁶ This trend demonstrates that establishing the greenway from 890 Columbia Drive to the Avondale MARTA station will increase the economic competitiveness of the neighborhood. The collaboration of many partners to accomplish the cleanup of an old gas station that released contaminants into the environmental for greater than ten years,

⁶ Leinberger, Christopher, *The WalkUP Wake-up Call: Atlanta*, retrieved December 27, 2013 from www.business.gwu.edu/walkup/atlanta2013

and its redevelopment into a greenspace and trailhead supports existing communities and demonstrates the value of communities and neighborhoods.

c) Economic and Community Benefits:

i. Economic or Other Benefits:

EDG is committed to the creation of an open greenspace that will provide a trailhead for a walking and biking path to the Avondale MARTA station. In addition, the site will be combined with other adjacent parcels to create over 2 acres of community greenspace and an outdoor environmental classroom for students from the nearby schools. Furthermore, EDG has been contacted by a refugee assistance organization seeking land for refugee farmers. Upon completion of the environmental remediation and assurance that site soils are safe, EDG plans to collaborate with this organization to perhaps cultivate a community garden. While all of these uses are not-for-profit in nature, they still have significant economic benefits for the community.

For example, the redevelopment of the former 890 Columbia Drive gas station into a trailhead that supports use of the MARTA system can only further Decatur's economic successes as a WalkUp community. As previously mentioned, the *Walkable Urban Places* study highlights Decatur's walkability as a model for promoting economic activity. The research revealed that out of 27 WalkUps in the metro Atlanta area, Decatur (classified as a 'suburban town center') had one of the largest provisions of affordable housing with the highest sales-per-square-foot values of for-sale housing prices – meaning the city's affordable housing coupled with highly sought after market-rate units resulted in the greatest degree of income diversity. This diversity led the researcher to predict that it will stay affordable in the future. The report further documents that WalkUps in the metro Atlanta area significantly impact economic growth and development, accounting for 55% of the region's land area and 20% of the region's office, retail, and other commercial real estate, 22% of the region's jobs, and an average rent for all development types that is 112% higher than in drivable suburban areas.⁷

In addition, the two acres of greenspace that the subject site's redevelopment will provide will also offer an economic benefit. In 2009, The Trust for Public Land published, "Measuring the Economic Value of a City Park System". This report examines seven major benefits of parks—property values, tourism, direct use, health, community cohesion, clean water, and clean air. It determined that excellent parks can increase the value of nearby properties by 15%, while parks commonly increase the value by at least 5%. Also, it is estimated that 35% of every dollar spent by tourists who come to visit parks goes to the local economy. Parks allow for increased exercise in a community, and exercise saves \$500 in health costs yearly for individuals 65 years and older, while a \$250 savings is realized for individual exercisers under 65. "Numerous studies have shown that the more webs of human relationships a neighborhood has, the stronger, safer, and more successful it is...parks offer opportunities for people of all ages to interact, communicate, compete, learn, and grow."⁸ The value of greenspace, especially, high quality ones like the one proposed for 890 Columbia Drive, will have significant impact economically as well as socially, physically, mentally, and emotionally for the neighborhood residents.

ii. Job Creation Potential:

A \$300,000 EPA Brownfields Job Training grant was awarded in 2010 to the Center for Working Families in Atlanta, Georgia. With funds from the job training program, 34 students were trained and 29 graduates were placed in environmental jobs. Due to the proximity of Atlanta to Decatur, preference will be given to environmental consultants who demonstrate they either hire locally or from the pool of graduates from the Center for Working Families program.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a) Programmatic Capability:

EDG, with assistance from a qualified contractor, has the ability to effectively manage and oversee all phases of the remediation work under this grant. Ms. Michele Ritan is the director of East Decatur Greenway. She has worked in fundraising since the early 1990s and is currently employed by Georgia

⁷ *ibid.*

⁸ "Measuring the Economic Value of a City Park System", The Trust for Public Land, 2009.

State University as the development writer in Corporate and Foundations Relations. She is responsible for researching prospective funders, proposal writing, managing the grants calendar, and providing required reporting to foundations and corporations. Ms. Ritan, who will serve as the Brownfields Project Director, has been managing the finances of EDG since it was formed. She has been asked to serve a member of the advisory committee for DeKalb County's Brownfields Cleanup Revolving Loan Fund and has already hired an experienced Brownfields consultant. EDG released a Request for Qualifications following procurement guidelines established in 49 CFR 30. Responses were due May 31, 2013. An experienced brownfields consultant was selected in order to begin project activities immediately upon grant funds being awarded and to assist with any grant management.

b) Audit Findings:

There have been no adverse audit findings for any grants with which Ms. Ritan has worked.

c) Past Performance and Accomplishments:

- ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements:

EDG has not received an EPA Brownfields Grant, nor has it received other federal or non-federal grants. EDG is a relatively new non-profit organization having its non-profit status recognized by the Internal Revenue Service in April of 2012. While the director of EDG has not managed all aspects of a grant, she has been involved in obtaining grants for Georgia State University and has been responsible for complying with deadlines in the grant and grant reporting. A list of grants that Ms. Ritan has worked with at Georgia State University follows:

- The Goizueta Foundation, December 2011 - \$5,000,000 in support of scholarships and academic programs. The funding established the Latino Leadership Awards, recognizing the needs of the growing Latino population of the metro Atlanta area. The scholarship is awarded to 25 students per year for four years, and is designed to increase the number of students of Hispanic/Latino origin who enroll and complete their undergraduate degrees at Georgia State. The scholarship funds provide mentors, internships, and community service experiences to these students so that they can become the leaders of the future. Ms. Ritan works with the office of Latino Affairs on programmatic goals for the grant. She has continued to manage the annual reporting process for this five-year grant and made timely reports.
- The Coca-Cola Foundation, December 2011 - \$1,300,000 in support of First Generation Scholarship Program. Recipient students who are the first in their families to attend college receive \$5,000 per year, renewable for four years, dependent on maintaining a 3.0 GPA, full-time enrollment, and enrollment in a Freshman Learning Community their first semester. The scholarship funds provide specially targeted support services for first generation student to help them adjust to college life, as well as leadership development. Ms. Ritan works with Coca-Cola Foundation staff to report grant progress, clarify goals, and plan modifications to the programmatic component. All reporting requirements have been met.
- Arthur M. Blank Family Foundation, February 2012 - \$217,000 in support of Birth Through Five teacher training. These funds support an innovative academic program to provide professional training at the bachelor degree level for students who wish to work in early childhood education. The funds also support local early childcare centers, providing training for center staff, as well as mentoring for center directors. Ms. Ritan works closely with Georgia State staff on reporting and program modifications. All reporting requirements have been met.
- The Zeist Foundation – June 2012 - \$75,000 in support of Birth Through Five. This is the same program described above. Ms. Ritan manages the reporting process for this grant. All reporting requirements have been met.
- Ray C. Anderson Foundation, June 2013 - \$41,000 in support of faculty sustainability initiatives. These funds support incorporation of sustainability curricula into professors' curricula across many academic disciplines. The grant funds provide training for professors and enhance their ability to teach principles of sustainability in their academic subject. Ms. Ritan works with Georgia State faculty on grant implementation and the reporting requirements. All reporting requirements have been met.

THRESHOLD CRITERIA FOR CLEAN-UP GRANTS

1. APPLICANT ELIGIBILITY

- a. The East Decatur Greenway (EDG) is a 501(c) 3 non-profit organization. Documentation of this status is included in Attachment 1.
- b. EDG acquired the property by sheriff's sale on November 6, 2012. EDG is the sole owner of the property and has fee simple title.

2. LETTER FROM STATE OR TRIBAL ENVIRONMENTAL AUTHORITY

Madeleine Kellam, Brownfields Coordinator, Georgia Department of Natural Resources, Environmental Protection Division issued a letter acknowledging this grant proposal and their support of the planned cleanup of the 890 Columbia Drive Property just outside of Decatur, Georgia. The Georgia Environmental Protection Division letter is included as Attachment 2.

3. SITE ELIGIBILITY AND PROPERTY OWNERSHIP ELIGIBILITY

Site Eligibility

a. Basic Site Information

- i) 890 Columbia Drive Property
- ii) 890 Columbia Drive, Decatur, Georgia 30030-4159
- iii) East Decatur Greenway
- iv) Owned property since November 6, 2012

b. Status and History of Contamination at the Site

- i) Petroleum substances
- ii) The parcel that is the subject of this application was operated as a gas /automobile repair station from the 1940s until 1999. It was abandoned in 1999 and began to deteriorate. This property is next door to a kindergarten – middle school and is unfenced. After EDG acquired the property, it applied to EPA Region IV's Targeted Brownfields Assessment (TBA) Program. Through the TBA program, the building on the property was demolished and the tanks and associated canopy and piping were removed, so the property does not have structures on it. The site is currently vacant.
- iii) A Phase II Environmental Site Assessment (ESA) was conducted on the property through the TBA Program to assist in the requirements of the Corrective Action Plan required by and approved by the Georgia Brownfields Program. Soil, groundwater, surface water, and sediment samples were collected and contamination was detected in all but the surface water.
- iv) Apparently, the property became contaminated from about 50 years of operation as a gas/automobile repair station. A May 1, 2013, Phase II ESA report found that the soils are impacted by benzene, toluene, ethylbenzene, and xylenes (BTEX) constituents of petroleum products above the Georgia Brownfields Program's Risk Reduction Standards (RRS) with benzene and ethylbenzene more prevalent in the soils as they were detected in 12 of the 20 soil samples collected. The groundwater is contaminated with BTEX constituents that were detected at levels exceeding RRSs in 6 of the 7 wells sampled and free product was detected in one well. In addition toluene was detected in the downgradient sediments of the adjacent stream.

c. Sites Ineligible for Funding

- (a) This site is NOT listed or proposed for listing on the National Priorities List.
- (b) This site is NOT subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
- (c) This site is NOT subject to the jurisdiction, custody, or control of the United States government.

d. Sites Requiring a Property-Specific Determination

This site does NOT require a property-specific determination.

e. Environmental Assessment Required for Cleanup Proposals

A Phase II Environmental Site Assessment was conducted under EPA Region IV's Targeted Brownfields Assessment Program in accordance with ASTM E 1903-11. This report is dated May 1, 2013. This Phase II ESA included the following: an asbestos survey of the building which confirmed the presence of ACM; the abatement of asbestos in the building; the demolition and off-site disposal of the building in order to collect samples beneath it; the removal and proper disposal or recycling of 3 USTs, 75 feet of associated product piping, two dispenser islands, and 318 cubic yards of petroleum contaminated soils around the UST system; and, the collection of 20 soil samples, 7 groundwater samples, 3 sediment samples, and 3 surface water samples.

i. Petroleum Sites

Madeleine Kellam, Brownfields Coordinator, Georgia Department of Natural Resources, Environmental Protection Division issued a petroleum eligibility determination letter for the 890 Columbia Drive property. It is included as Attachment 3.

4. CLEANUP AUTHORITY AND OVERSIGHT STRUCTURE

- a. EDG has entered into the Georgia Brownfields Program. On December 6, 2011, EDG submitted a Prospective Purchaser Corrective Action Plan (CAP) for 890 Columbia Drive. This CAP was approved by Madeleine Kellam, Brownfields Coordinator, Georgia Department of Natural Resources, Environmental Protection Division (EPD) on December 12, 2011. After acquisition of the property, EDG applied to EPA Region IV's Targeted Brownfields Assessment (TBA) Program. All CAP work completed to date was completed by the TBA Program. EDG will work closely with the assigned EPA Region 4 project manager and GA EPD to ensure the cleanup is completed in a manner which is protective of human health and the environment.

EDG will seek the technical expertise of a brownfield/environmental consultant to manage, oversee, and complete the cleanup activities at the 890 Columbia Drive property. EDG will select the qualified consultant with brownfields experience through a competitive process in accordance with the competitive procurement provisions of 40 CFR 31.36.

- b. Based on the Phase II ESA completed by EPA Region IV's TBA Program, EDG does not anticipate the need to conduct off-property cleanup. However, should access be necessary, EDG has a good working relationship with the Friends School of Atlanta which is next door. The Friends School has provided a letter of support and offer of assistance for this clean up. Also, several small adjacent parcels are owned by Charles Bosserman who plans to donate the properties to EDG so that the property size will be large enough to accommodate the planned redevelopment. A leveraging letter acknowledging Mr. Bosserman's planned donation has been provided.

5. COST SHARE

EDG is petitioning EPA to waive the cost-share requirement. A Hardship Waiver Request is included as Attachment 4.

6. COMMUNITY NOTIFICATION

A public notice was printed in the local newspaper, *The DeKalb Neighbor*, on January 8, 2014, announcing EDG's intention to submit this EPA Brownfield Cleanup Application and the availability of the draft ABCA application. The notice invited community members to attend a public meeting on January 9, 2014 at 6:30 pm at the Columbia Presbyterian Church, 711 Columbia Drive, Decatur GA, located very near the 890 Columbia Drive property. The meeting announcement was also posted on EDG's Facebook page <https://www.facebook.com/EastDecaturGreenway>. The public notice informed readers that both the draft ABCA and grant application were available for review and

Petroleum Brownfield Cleanup Proposal | 890 Columbia Drive Project | Georgia

comment at East Decatur Station, 111-C New Street, Decatur, Georgia 30030, that the draft grant application would be available from January 10, 2014 until January 20, 2014 just before the grant is submitted on January 22, 2014, and that the draft ABCA is available for the same time, from January 10, 2014 until January 20, 2014. A copy of the advertisement and the Facebook notice are included as Attachment 5. The Draft ABCA is included as Attachment 6.

Following announcement of the grant proposal and notification as described above, a public meeting was held on January 9, 2014 at 6:30 pm at the Columbia Presbyterian Church. A sign-in sheet, and meeting summary, including comments and responses are included in this grant application as Attachment 7.

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date:

APR 09 2012

EAST DECATUR GREENWAY INC
C/O MICHELE RITAN
1108 WALKER DR
DECATUR, GA 30030

Employer Identification Number:
43-3950791

DLN:
17053054307042

Contact Person:
DEL TRIMBLE ID# 31309

Contact Telephone Number:
(877) 829-5500

Accounting Period Ending:
December 31

Public Charity Status:
170(b)(1)(A)(vi)

Form 990 Required:
Yes

Effective Date of Exemption:
December 2, 2011

Contribution Deductibility:
Yes

Addendum Applies:
No

Dear Applicant:

We are pleased to inform you that upon review of your application for tax exempt status we have determined that you are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code. Contributions to you are deductible under section 170 of the Code. You are also qualified to receive tax deductible bequests, devises, transfers or gifts under section 2055, 2106 or 2522 of the Code. Because this letter could help resolve any questions regarding your exempt status, you should keep it in your permanent records.

Organizations exempt under section 501(c)(3) of the Code are further classified as either public charities or private foundations. We determined that you are a public charity under the Code section(s) listed in the heading of this letter.

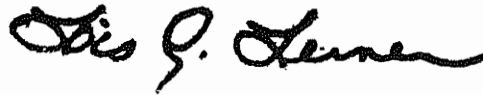
Please see enclosed Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, for some helpful information about your responsibilities as an exempt organization.

Letter 947 (DO/CG)

EAST DECATUR GREENWAY INC

We have sent a copy of this letter to your representative as indicated in your power of attorney.

Sincerely,

A handwritten signature in black ink, appearing to read "Lois G. Lerner". The signature is fluid and cursive, with the first name "Lois" being more prominent.

Lois G. Lerner
Director, Exempt Organizations

Enclosure: Publication 4221-PC

Georgia Department of Natural Resources

Environmental Protection Division—Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054, Atlanta, Georgia 30334

(404) 656-7802; FAX: (404) 651-9425

Judson H. Turner, Director

January 7, 2014

Ms. Cindy J. Nolan
U.S. Environmental Protection Agency
Region 4
Atlanta Federal Center
61 Forsyth Street (SNFC, EPA Mail Rm)
Atlanta, GA 30303

RE: State Support Letter – Brownfields Cleanup Grant Application
East Decatur Greenway, Inc.
Property at 890 Columbia Drive Decatur, DeKalb County, Georgia

Dear Ms. Nolan:

East Decatur Greenway, Inc. (EDG) has asked the Georgia Environmental Protection Division (GA EPD) to provide a letter pursuant to the threshold eligibility criteria for funding under the U.S. Environmental Protection Agency's Small Business Liability Relief and Brownfields Revitalization Act. EDG will be submitting an application to the U.S. Environmental Protection Agency (EPA) for funding assistance under the federal Cleanup Grant Program to clean up a former gas station located at 890 Columbia Drive Decatur, DeKalb County, Georgia.

Between the 1940's until 1999, the property operated as a gas station with a service garage, until the mid-1950's, and most recently with a convenience store. The property has been vacant since 2000. Most recently three 8,000 gallon underground storage tanks (USTs) were installed on the property in the late 1990's, but were never used.

On December 6, 2011, prior to acquiring the property, EDG submitted a brownfields application and prospective purchaser corrective action plan (CAP) pursuant to the Georgia Hazardous Sites Reuse and Redevelopment (Brownfields) Act to the GA EPD. The CAP proposes tank closure in accordance with Georgia's Rules for Underground Storage Tanks and excavation of soils with detections of regulated substances above the risk reduction standards (state cleanup standards). On December 12, 2011, the GA EPD approved the CAP for the property. Pursuant to Section 12-8-207(a) of the Georgia Brownfields Act, EPD's CAP approval conveys a provisional limitation of liability upon EDG that is contingent upon timely implementation of the approved CAP and certification of compliance with the state cleanup standards for soil and source material in accordance with the approved schedule. The limitation of liability protects EDG against third party lawsuits and the responsibility for groundwater cleanup.

To date, the three USTs were removed from the property and approximately 318 cubic yards of petroleum contaminated soil have been disposed off-site as part of an EPA Targeted Brownfields Assessment. EDG now has until December 31, 2017 to complete CAP implementation and submit a compliance status report certifying that the soil and source material on the property have been brought into compliance with the state cleanup standards.

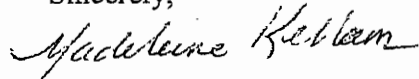
Following completion of site remediation, EDG intends to redevelop the property into a trailhead for a multiuse bicycling/pedestrian path, which will connect with public transit, Avondale Metro Atlanta

Ms. Cindy J. Nolan
January 7, 2014
Page 2

Rapid Transit Authority Train/Bus Station. This will greatly help to ease the traffic in this very densely populated part of DeKalb County by providing direct access to mass transit.

EPD would like to take this opportunity to encourage EPA's positive decision in making a grant award to EDG. Successful award would greatly assist EDG with its redevelopment efforts for this property, which continues to be an eyesore for the community. Both the EDG and the State of Georgia are eager to move forward with the cleanup of this property and again, we encourage EPA's positive decision in consideration of EDG's grant application.

Sincerely,



Madeleine Kellam
Brownfields Coordinator

cc: Michele Ritan, East Decatur Greenway, Inc.
Mr. Brian Gross, U.S. EPA Region 4

File: Brownfields ARC Grants, East Decatur Greenway, Inc.

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Georgia Department of Natural Resources
Environmental Protection Division—Land Protection Branch
2 Martin Luther King Jr., Dr., Suite 1054, Atlanta, Georgia 30334
(404) 656-7802; FAX: (404) 651-9425
Judson H. Turner, Director

January 7, 2014

Ms. Cindy J. Nolan
U.S. Environmental Protection Agency
Atlanta Federal Center
61 Forsyth Street (SNFC, EPA Mail Rm)
Atlanta, Georgia 30303

RE: State Eligibility Determination-Brownfields Cleanup Grant Application
East Decatur Greenway, Inc.
Property at 890 Columbia Drive Decatur, DeKalb County, Georgia

Dear Ms. Nolan:

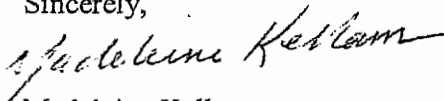
It is our understanding that East Decatur Greenway, Inc. (EDG) will be submitting an application to the U. S. Environmental Protection Agency for funding assistance under the federal Petroleum Cleanup Grant Program established under the Small Business Liability Relief and Brownfields Revitalization Act. The grant funding request is for the purpose of conducting an environmental cleanup at the abovementioned property.

The applicant, EDG, has asked the Georgia Environmental Protection Division (EPD) to provide this letter to address the eligibility determination requirements of *Appendix 1, Section 1.3.2* of the grant application guidelines. Accordingly, EPD submits the following determinations, made on the basis of information submitted by the applicant, pursuant to the criteria set forth in the guidelines:

1. The site is of "relatively low risk" compared with other "petroleum-only" sites in the state.
2. There is no viable responsible party.
3. The site will not be assessed, investigated, or cleaned up by a person that is potentially liability for cleaning up the site.
4. The site is not subject to a corrective action order under the Resource Conservation and Recovery Act (RCRA) §9003(h).

A copy of this letter has been forwarded to EDG for inclusion in their grant application package. Should you have any questions, please contact me at 404-657-8616.

Sincerely,



Madeleine Kellam
Brownfields Coordinator

File: East Decatur Greenway, Inc.
cc: Michele Ritan, East Decatur Greenway, Inc.
Brian Gross, US EPA Region 4

Cost-Share Hardship Waiver Request East Decatur Greenway

East Decatur Greenway (EDG) is applying for \$200,000 in cleanup funds and a cost-share hardship waiver for the required 20% match to complete cleanup activities at 890 Columbia Drive, Decatur, Georgia. EDG is a small nonprofit with limited funding; without the hardship waiver, it will be difficult to proceed with the project.

The proposed funding will be used to address environmental cleanup activities at this petroleum site as detailed in the application. The successful cleanup will make possible East Decatur Greenway's proposed redevelopment, a trailhead for a multiuse, off-street bicycling/walking path. This facility will allow people in this densely populated part of DeKalb County to move safely between neighborhoods, rapid transit, churches, and schools without the use of automobiles. Redeveloping 890 Columbia Drive into a trailhead to provide a connection to the Avondale MARTA station will give walkers and cyclists easy access to downtown Decatur and its shopping, restaurants, medical facilities, and services, thus supporting the local economy. Safe multiuse trails promote the health of adults and children by reducing auto emissions and providing safe places to exercise, play, and connect with others.

EDG was founded by community members with the sole purpose of remediating the abandoned, contaminated former gas station and transforming it into a greenspace for use by local citizens. We invested a significant amount of funds (more than \$60,000) and time (the last three years) to acquire this orphan site that nobody else wanted to touch in order to create a better environment for the local community, as well as the people downstream. The stream contains contaminated sediment and is a hazard to children, particularly downstream from the site, who live in an economically challenged neighborhood.

EDG's redevelopment plans also include partnering with three local schools to develop environmental education classrooms on the site, and watershed protection by adopting the stream that borders the property, thereby contributing to water quality as well as educating the next generation about care for the environment.

EDG relies on community support and philanthropy. Many of the residents closest to the site are working people, but are not affluent, and do not have the capacity for substantial financial contributions. Other residents within a half mile radius of the site are living in significant poverty. While EDG was fortunate to have a local businessman who contributed to property acquisition, we are relying on community support in the future. We plan to seek support from foundations; however, these dollars are competitive and favor long-established organizations.

We have requested a contribution from DeKalb County (in which 890 Columbia lies) for the proposed multiuse path from DeKalb County. However, the county is in significant financial difficulty and the CEO is currently under indictment, so we do not know if funds will be forthcoming for that project.

A waiver of the 20% match will go a long way toward our goal to clean up this property that has been both a health hazard and community eyesore for many years. We have ambitious plans to transform it into a place of beauty and learning for the many residents of this area that cannot be realized until the environmental contamination is remediated.

North Dekalb Neighbor

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WEDNESDAY, JANUARY 8, 2014

VOL. 45, No. 2 - 50¢

East Decatur Greenway, Decatur, Georgia - 809 Columbia Drive (Former Gas Station) Brownfields Cleanup Project

Public Notice: Submission of EPA Brownfields Cleanup Grant Application and Analysis of Brownfields Cleanup Alternatives (ABCA)

East Decatur Greenway (EDG) is submitting a Brownfields Cleanup Grant Application to the United States Environmental Protection Agency (EPA) to conduct cleanup activities at a former gas station located at 809 Columbia Drive, Decatur, Georgia. The parcel identification number from the DeKalb County Tax Commissioner's Office is "15 216 10 010" (Ref. 2). Brownfields are identified as real property where the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. The grant amount requested is \$200,000 with the EDG making a match of \$40,000. If funded, the grant will be used for cleanup work as well as community outreach. The cleanup work will be performed in accordance with one of the alternatives outlined in the Analysis of Brownfields Cleanup Alternatives (ABCA). The purpose of the ABCA is to evaluate various cleanup/management alternatives for contaminated surface and sub-surface soils. This notice is to inform the community of the preparation of the grant application and the draft ABCA. The ABCA is available for public comment from the community meeting on January 9, 2014, and ending January 20, 2014, prior to the grant application submission. A draft copy of the ABCA will be available at the leasing office of East Decatur Station, located at 111-C New Street, Decatur, Georgia, and on EDG's Facebook page beginning January 10, 2014. The draft grant application is available for review and comment at the leasing office of East Decatur Station and on EDG's Facebook page from January 10, 2014, until January 20, 2014, before the grant is submitted on January 22, 2014. Community input is an integral and meaningful part of this type of project, and public and community-based organizations are encouraged to review the draft grant application and ABCA and provide comments. This matter will be discussed in a public meeting on Thursday, January 9, 2014 at 6:30 pm, at Columbia Presbyterian Church sanctuary, 711 South Columbia Drive, Decatur, GA, 30030. Interested citizens are invited to attend the meeting. Interested community-based organizations are also encouraged to contact Michele Ritan or Gail Rawls Jeter to provide comments and/or show support. Please contact or send any comments about the grant application and/or draft ABCA to the following:

Michele Ritan
Executive Director
East Decatur Greenway
Post Office Box 2316
Decatur, Georgia, 30030
(404) 259-5338 - Phone
East Decatur Greenway (eastdecaturgreenway@gmail.com)

Or

Gail Rawls Jeter
Cardno, Inc
1233 Washington Street, Suite 1000
Columbia, South Carolina 29201
Gail.Jeter@Cardno.com
(803) 929-6059 - Phone
(803) 765-8312 - Fax

The documents required for public review in reference to EDG's application for an EPA Brownfields Cleanup grant are available in two places:

You are posting, commenting, and liking as East Decatur Greenway. [Change to Michele Ritan](#)



Brooke Wilson

Are you pioneering a neighborhood-level project so awes...

April 11, 2013 at 3:26pm

33

[Home](#) [Michele](#)

Decatur Station Leasing Office
East Decatur Greenway
Decatur, GA 30030

Online at this Dropbox link

<https://www.dropbox.com/sh/6owpoy2p3m2t38h/hUuR0Ds9oh>



EDG - EPA Documents

www.dropbox.com

Shared with Dropbox

Like Comment Share

Sara Nicol likes this.



Write a comment...

73 people saw this post

[Boost Post](#)

East Decatur Greenway
January 7

Meeting reminder: Jan 9, 6:30, Columbia Presbyterian sanctuary. This is the public meeting about the environmental cleanup of the former gas station at 890 Columbia. We want your input!

Like Comment Share

74 people saw this post

[Boost Post](#)

East Decatur Greenway
January 2

Public meeting: January 9. Please join us - we want your input!

East Decatur Greenway (EDG) is submitting a Brownfields Cleanup Grant Application to the United States Environmental Protection Agency (EPA) to conduct cleanup activities at a former gas station located at 809 Columbia Drive, Decatur, Georgia. This notice is to inform the community of the preparation of the grant application, and to seek community input.

The meeting will be held January 9, 2013 at 6:30 pm in the sanctuary of Columbia Presbyterian Church, 711 Columbia Drive, Decatur GA, 30030. For more information, please contact East Decatur Greenway:

eastdecaturgreenway@gmail.com
404-259-5338 (Michele Ritan, director)
www.facebook.com/EastDecaturGreenway



East Decatur Greenway

We are a nonprofit corporation, with the 501(c)(3) designation. Our mission is to create community greenspace, remediate environmental contamination, and build safe trails for bicycling and walking in this densely populated part of DeKalb County.
Non Profit Organization · 204 like this

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Sara Nicol Thanks, Michele. Will the Phase II ESA be made public?

January 2 at 3:07pm · Like



East Decatur Greenway Hi, Sara Nicol. Yes, the Phase II is available for review. I can bring it to the meeting or arrange to get it to another way if you wish.

January 2 at 4:03pm · Like



Write a comment...

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Samantha Rhinehart Harrell

Just curious of the location for the bicycle path

January 17, 2013 at 10:28am

More Posts



East Decatur Greenway

January 9

Hope to see you tonight at 6:30 for the East Decatur Greenway public meeting to discuss environmental cleanup. We'll have goodies from Whole Foods to help you make it to dinner time. Columbia Presbyterian Church, 6:30 pm, third floor of sanctuary building.

Like Comment Share

75 people saw this post

[Boost Post](#)



East Decatur Greenway

January 8

The meeting Thursday, Jan 9 at Columbia Presbyterian may be moved from the sanctuary to a room on the third floor due to heating problems. Look for signs and people to guide you! Hope to see you at 6:30!

Like Comment Share

75 people saw this post

[Boost Post](#)



East Decatur Greenway

December 30, 2013

Thanks to all who have contributed to East Decatur Greenway! There are still two days to make your tax-deductible, year end gift. Just click on the Donate link or mail a check to: PO Box 2316, Decatur GA, 30031.

Like Comment Share

4 people like this.



Write a comment

4,268 people saw this post

[Boost Complete](#)



East Decatur Greenway

December 27, 2013

Friends, please consider a tax-deductible gift to East Decatur Greenway.

As you know, East Decatur Greenway (EDG) acquired the abandoned gas station at 890 Columbia Drive. We're cleaning up environmental contamination and transforming it ... See More



East Decatur Greenway | Make a tax-deductible gift to EDG

We are a nonprofit corporation, with the 501(c)(3) designation. Our mission is to create community greenspace, remediate environmental contamination, and build safe trails for bicycling and walking in this densely populated part of DeKalb County.
Non Profit Organization · 204 like this

Like Comment Share

6 people like this.

View 1 more comment



East Decatur Greenway Thanks, Joshua Larned!

December 27, 2013 at 4:05pm · Like



Georgia Trail Summit We'd love to have your voice at our next trail planning meeting. See you there?

December 23, 2013 at 1:17pm · Like

[Chat \(5\)](#)

May 1, 2013

Mr. Bob Rosen
Brownfields Project Manager
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW, 11th Floor
Atlanta, Georgia 30303

**Subject: Final Analysis of Brownfields Cleanup Alternatives
East Decatur Greenway Petroleum TBA
Decatur, DeKalb County, Georgia
EPA Contract No. EP-W-05-054 (START III, Region 4)
Technical Direction Document No. TTEMI-05-003-0147**

Dear Mr. Rosen:

The Tetra Tech Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) is submitting this final Analysis of Brownfields Cleanup Alternatives (ABCA) for the East Decatur Greenway (EDG) Petroleum Targeted Brownfields Assessment (TBA) site located in Decatur, DeKalb County, Georgia. This ABCA was prepared in support of the Phase I and II environmental site assessments (ESA) conducted at the site.

The purpose of this ABCA is to identify measures necessary to conform to regulatory requirements, evaluate cleanup options that would mitigate risks to human health and the environment associated with contamination at the site, and develop rough cost estimates for each cleanup option.

INTRODUCTION AND BACKGROUND

The EDG site is located at 890 Columbia Drive, Decatur, DeKalb County, Georgia (herein referred to as “the site”). The site is approximately 1.1 acres and is bordered to the east by the East Branch of the Middle Fork of Shoal Creek (“Shoal Creek”), to the southwest by Columbia Drive, and to the northwest by a natural gas right-of-way and The Friends School of Atlanta. The geographic coordinates of the approximate center of the site are latitude 33.7605 north and longitude 84.2764 west (see Figure 1 in Enclosure 1). East Decatur Greenway, Inc., a not-for-profit organization, is the current owner of the property.

The site was developed in the 1940s as a gasoline station until it was abandoned in 1999. In February 1997, a gasoline underground storage tank (UST) release notification was submitted on behalf of the former property owner to the Georgia Environmental Protection Division (GAEPD) acknowledging that a gasoline release had occurred at the property. GAEPD issued a receipt of acknowledgement and requested the completion of a Corrective Action Plan, Part A (CAP-A). The property owner did not submit a CAP-A, and GAEPD subsequently issued a notice of violation (NOV) in 2005. The owner never responded to the NOV and GAEPD did not pursue further action. The site, which included three 8,000-gallon USTs, two dispenser islands, about 75 feet of buried product piping, and the former convenience store building, remained vacant following its abandonment in 1999.

In 2007, Environmental Technology Resources, Inc. (ETRI) conducted a Phase II ESA on behalf of Chuck Bosserman of First Realty Advisors as part of a potential real estate transaction. Soil and groundwater samples were collected during the Phase II ESA. Four soil borings were advanced on site and subsurface soil samples were collected. Benzene, toluene, and ethylbenzene were detected at levels exceeding applicable GAEPD UST Program soil thresholds. Groundwater samples were also collected on site and contained benzene concentrations above applicable GAEPD UST Program groundwater quality standards.

A Phase I ESA was conducted in 2011 by ETRI on behalf of East Decatur Greenway, Inc. as part of another real estate transaction. ETRI identified one recognized environmental condition (REC) at the site: the past release of petroleum with no evidence of corrective action. ETRI recommended soil and groundwater remediation and the removal of the USTs based on known subsurface contamination. In addition to the identified REC, ETRI noted the possibility of asbestos-containing material (ACM) in the convenience store building, due to the building's age.

In 2012, Tetra Tech was tasked by the EPA to conduct a Phase I ESA update. The Phase I ESA update confirmed the presence of USTs on site and the presence of suspected ACM in the convenience store building. EPA then directed Tetra Tech to proceed with a Phase II ESA investigation to determine the presence and nature of subsurface contamination on site. This assessment required the removal of the UST system (USTs, dispenser islands, and product piping) and the demolition of the convenience store building to allow sampling beneath these structures (see Figure 2 in Enclosure A). Prior to demolishing the building, suspected ACM was sampled and building material identified as ACM was removed by a licensed asbestos abatement contractor.

In addition to the ACM sampling, Tetra Tech's Phase II ESA included the collection of subsurface soil, groundwater, sediment, and surface water samples on and adjacent to the site. In accordance with GAEPD UST Program guidelines, soil and groundwater samples were collected from beneath removed UST system components. Each of these soil and groundwater samples contained petroleum constituent contamination above GAEPD regulatory limits. Tetra Tech also collected soil and groundwater samples from elsewhere around the site to determine if contamination had migrated laterally from beneath UST system components. Contamination above GAEPD regulatory limits was detected in soil and groundwater to the south and east of UST system components. At the time of sampling, groundwater flow was determined to be flowing eastward towards Shoal Creek. Sediment and surface water samples were collected from the creek. The sediment sample collected downstream of the site contained detectable levels of toluene and total petroleum hydrocarbons-gasoline range organics (TPH-GRO). Surface water samples did not contain detectable levels of petroleum constituents.

East Decatur Greenway, Inc. plans to include the property as part of a network of paths throughout the surrounding neighborhood.

REGULATORY STANDARDS

The applicable GAEPD UST Program regulatory standards for the petroleum contamination on site are the Soil Threshold Levels (STLs) for soil and In-stream Water Quality Standards (ISWQSs) for groundwater. The specific STLs used at EDG are for sites in Low Groundwater Susceptibility Areas where public water supplies do not exist within 1 mile and non-public water supplies do not exist within 0.25 mile. A water resources survey was conducted as part of the UST closure process and no drinking water resources were identified within the required search radii.

If East Decatur Greenway, Inc. determines that the site should be enrolled in the GAEPD Brownfields Program, Risk Reduction Standards (RRSs) should also be met. At the EDG site, Type III (standard, non-residential) RRSs should be used.

The regulatory standards are shown in Table 1 below, however; less stringent values may be calculated from site-specific fate and transport modeling.

| Table 1: East Decatur Greenway Regulatory Standards | | | | |
|---|----------------------|----------------------------------|--|---|
| | GAEPD UST Program | | GAEPD Brownfields Program | |
| | Soil Threshold Level | In-stream Water Quality Standard | Type III Risk Reduction Standard, Soil | Type III Risk Reduction Standard, Groundwater |
| Units | mg/kg | mg/L | mg/kg | mg/L |
| Benzene | 0.02 | 0.051 | 0.5 | 0.005 |
| Toluene | 135 | 5.98 | 100 | 1 |
| Ethylbenzene | 28 | 2.1 | 70 | 0.7 |
| Xylene, total | 700 | NL | 1,000 | 10 |

Notes:

| | |
|-------|---|
| GAEPD | Georgia Environmental Protection Division |
| mg/kg | milligrams per kilogram |
| mg/L | milligrams per liter |
| NL | Not listed |
| UST | Underground storage tank |

IDENTIFIED CONTAMINATION

Based on soil sampling results from the Phase II ESA, an estimated 2,080 cubic yards (cyd) of soil require remediation to meet STLs and 1,800 cyd require remediation to meet RRSs (See Figures 3 and 4 in Enclosure 1).

Based on groundwater sampling results from the Phase II ESA, the plume of contaminated groundwater is estimated to be about 11,000 square feet, extending from the UST pit southward to Shoal Creek. The extent of the plume has been delineated to the east by the absence of detectable levels of contamination in permanent monitoring well MW-05. Because the Phase II ESA groundwater investigation was limited to on-site wells, the extent of the plume has not been delineated to the north or west. Lower levels of contamination detected in permanent monitoring well MW-01, as well as the groundwater flow direction calculated during the Phase II ESA, suggest that the plume is moving south-southeast (see Figures 5 and 6 in Enclosure 1).

About 0.25-inch of free product was noted in temporary monitoring well TW-02, located adjacent to the former location of the northwest dispenser island (see Figure 7 in Enclosure 1). The absence of free product in any of the monitoring wells surrounding well TW-02 suggests that free product is limited in extent.



REMEDIATION PROCESS

East Decatur Greenway, Inc. should consider implementing free product removal. The free product presents a contaminant source that will continue to contaminate the surrounding subsurface unless it is removed.

Free product removal can be as simple as installing a well and using a hand bailer or passive skimmers to remove the free product. These methods are permitted for up to 60 days, after which more aggressive methods for removal (pumping, trenching, etc.) are required. Waste generated by these activities must be characterized and disposed of properly. The installation of a temporary well is about \$2,000, laboratory costs for waste characterization (BTEX analysis of liquid) are about \$50 per sample, and disposal costs vary, depending on the results of waste characterization. If the waste can be disposed of as non-hazardous waste, disposal costs are about \$50 per 55-gallon drum, with an additional flat fee of about \$275 per trip. If the waste is characterized as hazardous, the disposal cost rises to about \$425 per 55-gallon drum. Liquid waste generated from purging monitoring wells during the Phase II ESA was required to be disposed of as hazardous waste; liquid waste generated by free-product removal will most likely also need to be disposed of as hazardous waste. Free product removal should continue until the layer is less than 0.01 feet thick.

East Decatur Greenway, Inc. is currently in discussions with the GAEPD Brownfields Program to determine what measures will be required to bring the site into regulatory compliance. Unless waived by GAEPD, East Decatur Greenway, Inc. will be required to prepare and submit a CAP-A to the GAEPD UST Program. East Decatur Greenway, Inc. should obtain the services of an experienced environmental professional or firm, licensed to practice engineering and/or geology in the State of Georgia, to prepare the CAP-A. The CAP-A outlines site history, known contamination levels, groundwater flow data, potential contamination receptors, free product removal activities, and a proposed contamination delineation program. The cost for an environmental professional to prepare a CAP-A is typically about \$10,000. East Decatur Greenway, Inc. should inquire if the CAP-A requirement can be waived by GAEPD, based on the previously prepared UST Closure Report and Phase II ESA Report.

Because the extent of groundwater contamination has not been delineated to the north, west, or east, additional monitoring wells will need to be installed and sampled. This phase of the project is estimated to cost between \$10,000 and \$25,000, depending on the extent of contamination. Access from surrounding property owners will be required if off-site wells are installed.

Once the contamination plume has been adequately delineated, a Corrective Action Plan, Part B (CAP-B) should be prepared. A CAP-B details the goals of the remedial action and outlines the strategies proposed to meet these goals. Fate and transport modeling can be used during the CAP-B preparation to develop Alternate Cleanup Levels (ACLs). ACLs are site-specific risk-based contamination levels that can be used in place of RRSs and ISWQSs as cleanup goals. The cost of a CAP-B, including pilot-scale testing, fate and transport modeling, and report preparation, is estimated to be about \$40,000.

Upon approval of the CAP-B, cleanup measures can be implemented. Proposed options are discussed in the following section.

EVALUATION OF CLEANUP ALTERNATIVES

This section details possible cleanup alternatives for soil and groundwater contamination at the East Decatur Greenway site. This is not an exhaustive list, but presents three of the more common approaches to remediating UST sites. All cleanup plans will require the approval of GAEPD before implementation.

Option 1: Monitored Natural Attenuation

Monitored natural attenuation (MNA) relies on naturally-occurring physical, chemical, and biological processes to reduce contamination concentrations. BTEX contamination is suitable for MNA. The advantage of MNA is that minimal implementation and maintenance costs would be incurred: permanent monitoring wells are already installed on site and soil samples could be collected using a local drilling company. The disadvantage of MNA is that it offers a slower path to remediation than more active measures.

Before MNA can be considered, a soil characterization study would need to be completed to determine if conditions at EDG are amenable to MNA processes (contaminant volatilization, biodegradation, etc.). If conditions are found to be favorable, the only costs associated with MNA are quarterly soil and groundwater sampling, estimated to cost about \$16,000 to \$20,000 per year. However, the monitoring can last for decades.

Option 2: Soil Excavation and Removal

Soil removal at EDG would require the excavation of contaminated soil identified during the Phase II ESA, transportation of this soil to a disposal facility, and replacing the contaminated soil with clean backfill from off site. Soil excavation and removal represents the quickest means of reducing soil contaminants.

Costs for excavation, disposal, and replacement of petroleum-impacted soil range from about \$120 to \$150 per cyd of soil, based on bids submitted during the UST removal process. To clean up the estimated 1,800 cyd of soil to meet STL standards would cost from \$216,000 to \$270,000. To clean up the estimated 2,080 cyd to meet the RRSs would cost from \$250,000 to \$312,000.

Although groundwater is not directly remediated by this option, removal of contaminated soil and the free product reduces the chance that groundwater contamination may be present. Once contaminated soil is removed, ongoing groundwater monitoring may be necessary to ensure that groundwater contamination levels are being reduced. Quarterly groundwater monitoring would cost about \$12,000 to \$14,000 per year.

The large size of the excavation, relative to the size of the property, would present some practical obstacles for soil removal. Large amounts of near-surface soil and clean replacement soil from the UST system removal process that does not need to be disposed of off-site will need to be temporarily stockpiled during the excavation. These stockpiles can limit the movement of heavy equipment on site and present erosion and sedimentation control problems during rain events. For these reasons, it may be most practical to excavate and backfill small sections of the site at a time.

Because the site is adjacent to Shoal Creek (a "state water"), soil excavation (a "land disturbance activity") will require a land disturbance permit from DeKalb County, including the development of an Erosion and Sedimentation Control Plan, as well as a stream buffer variance permit for work conducted within 75-feet of Shoal Creek.

Option 3: Soil Vapor Extraction and Air Sparging

Soil vapor extraction (SVE) is an *in situ* remediation technology that reduces concentrations of petroleum contaminants in subsurface soils. Remediation wells are installed and a vacuum is applied to the wells. Subsurface soil contaminants volatilize and are extracted through the wells. The extracted vapors are treated by a system located at the surface and the treated gases are then released to the atmosphere.

Air sparging (AS) is used in combination with SVE to remediate contamination groundwater. Air sparging involves pumping ambient air into the saturated subsurface zone below the contaminant plume. This process promotes the volatilization of contaminants in the groundwater, which are then extracted with the SVE system. Air sparging also enhances biological conversion of petroleum into non-toxic compounds such as carbon dioxide and water.

Air sparging and SVE (AS/SVE) can be combined to create a system that remediates both soil and groundwater with minimal land disturbance. However, the speed and effectiveness can vary widely, depending on subsurface conditions. Because of these variables, estimating remediation costs can be difficult because the treatment time is unknown. Based on conditions at similar sites, Tetra Tech estimates that using AS/SVE at EDG would take about 12 months and cost between \$200,000 and \$350,000.

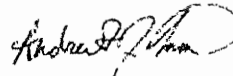
RECOMMENDATIONS

Of the three options presented, Option 3: Soil Vapor Extraction and Air Sparging is recommended. Because the on-site soil and groundwater has remained contaminated more than 15 years after the UST leak occurred, it is unlikely that Option 1: Monitored Natural Attenuation will be acceptable to GAEPD. Option 2: Soil Removal offers a quick solution to contaminated soil, but does not actively remediate groundwater contamination. Given the close proximity to Shoal Creek, GAEPD will likely prefer a solution that includes active groundwater remediation. AS/SVE offers a low disturbance solution that, properly implemented, should be acceptable to GAEPD.

Please call me, John Snyder, at (678) 775-3085 or Sandra Harrigan at (678) 775-3088 if you have any questions regarding this submittal.



John Snyder
Tetra Tech START III Site Manager



Andrew F. Johnson
Tetra Tech START III Program Manager

cc: Katrina Jones, EPA Project Officer
Angel Reed, START III Document Control Coordinator

Enclosure 1: Figures

Figure 1: Site Location

Figure 2: Former Site Layout

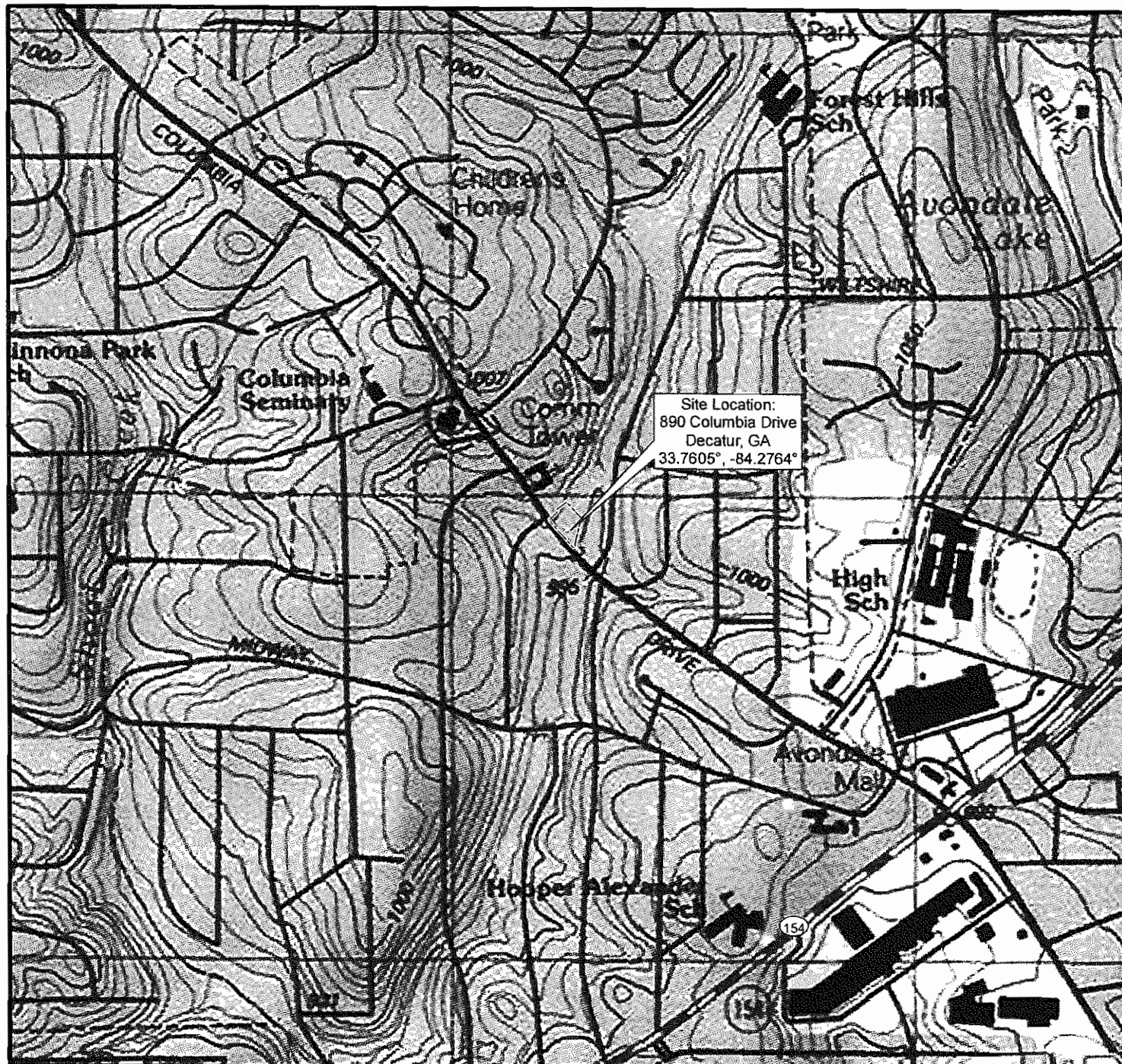
Figure 3: Soil Contaminated Above STLs

Figure 4: Soil Contaminated Above Type III RRSs

Figure 5: Estimated Groundwater Contaminated Above ISWQs

Figure 6: Estimated Groundwater Contaminated Above Type III RRSs

Figure 7: Estimated Location of Subsurface Free Product



Legend

Property Boundary



0 500 1,000
Feet
1:12,000

Map Source:
USGS 7.5 Minute Topographic Quadrangle Map:
Northeast Atlanta, GA 1997.



United States
Environmental Protection Agency
Region 4

FIGURE 1

Site Location

TDD Name: East Decatur Greenway
Petroleum TBA

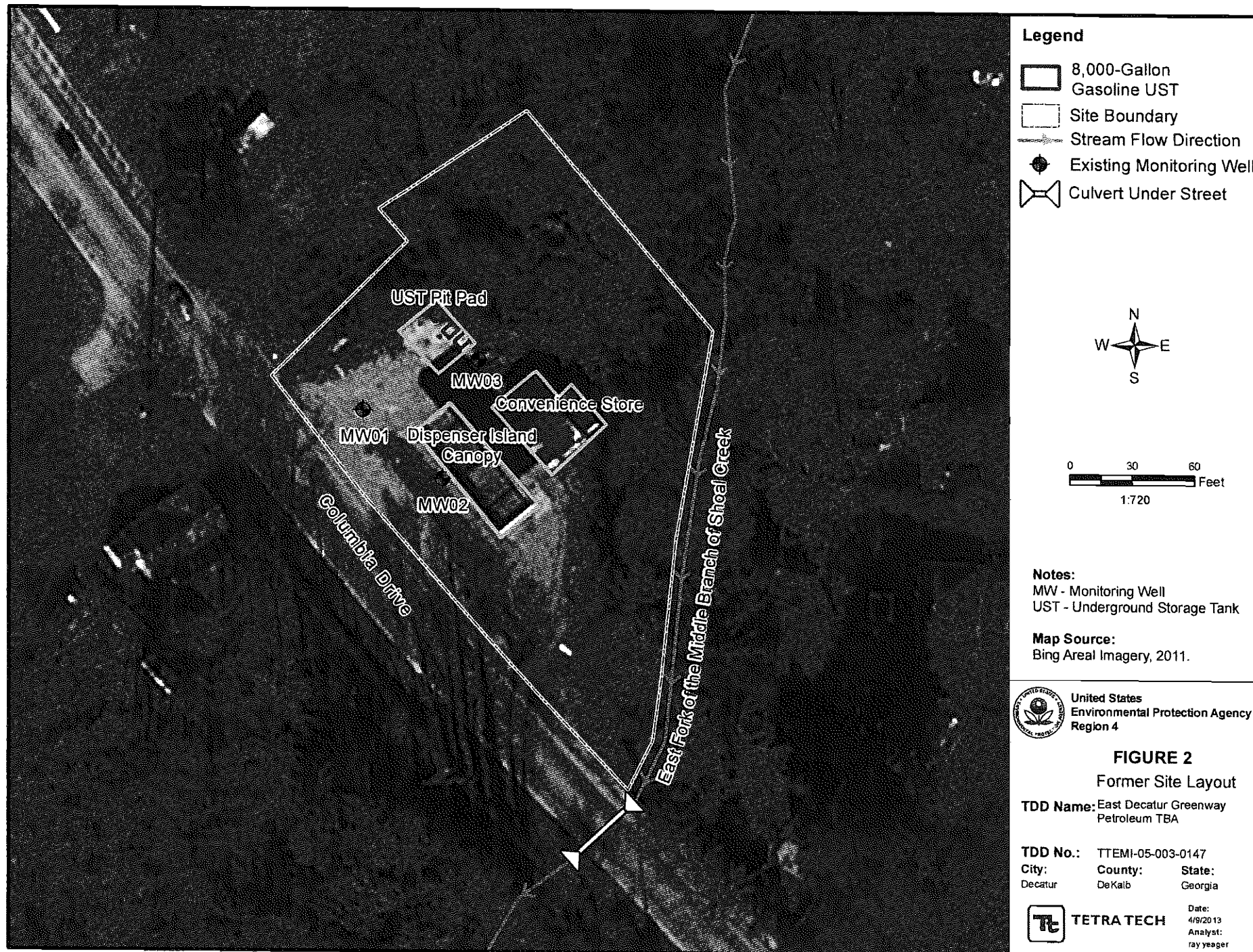
TDD No.: TTEMI-05-003-0147

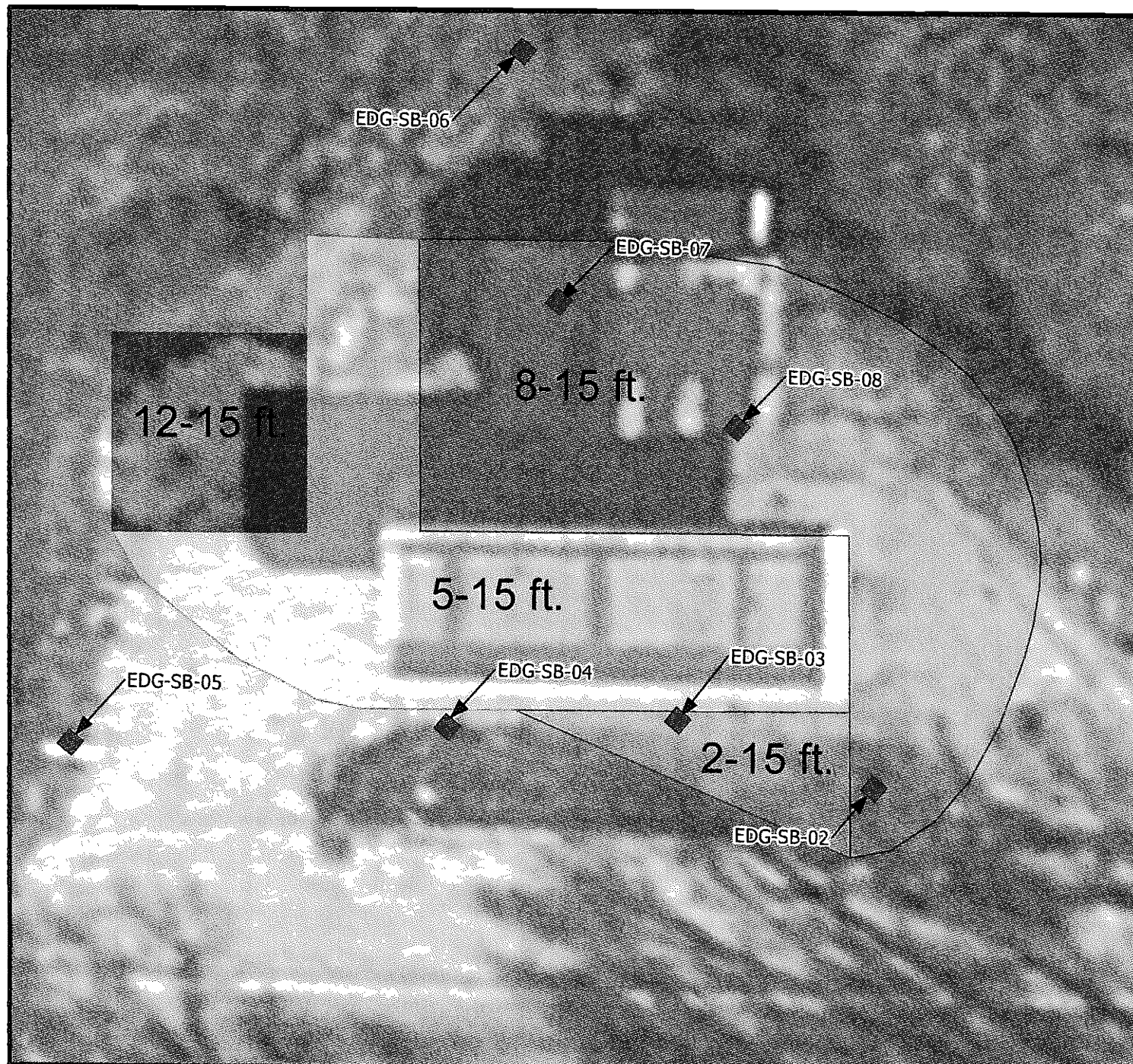
| | | |
|---------|---------|---------|
| City: | County: | State: |
| Decatur | DeKalb | Georgia |



TETRA TECH

Date:
4/8/2013
Analyst:
ray yeager





Legend

Soil Contaminated Above STLs

2-15 ft.

5-15 ft.

8-15 ft.

12-15 ft.

◆ Soil Sampling Location



0 10 20 Feet

Notes:

EDG - East Decatur Greenway

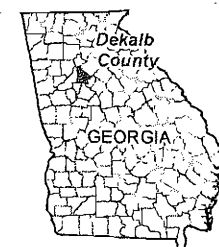
SB - Soil Boring

STL - Soil Threshold Level

All intervals shown are in feet below ground surface

Map Source:

Bing Aerial Imagery Service



United States
Environmental Protection Agency
Region 4

FIGURE 3

Soil Contaminated Above STLs

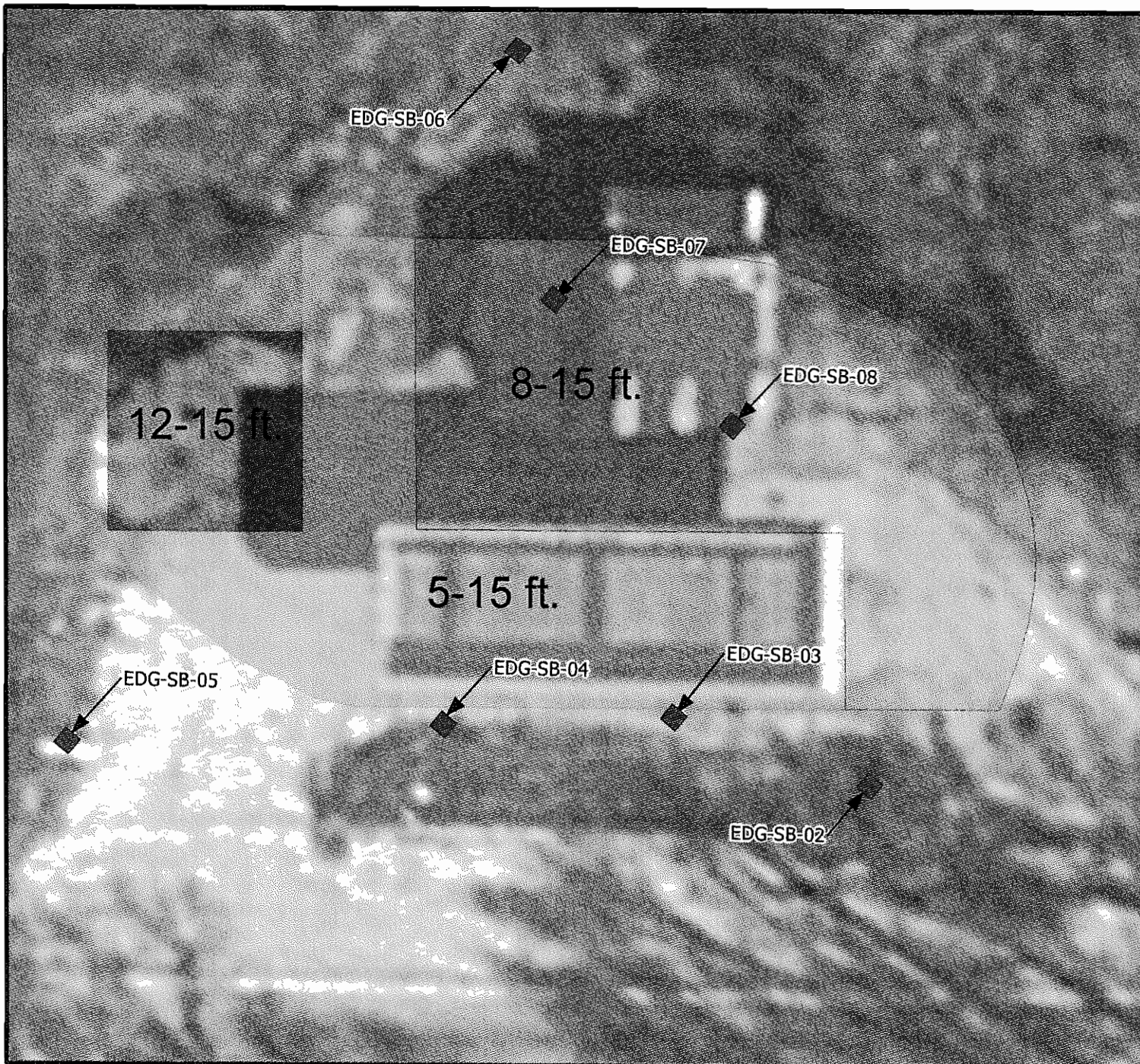
TDD Name: East Decatur Greenway
Petroleum TBA

TDD No.: TTEMI-05-003-0147

City: Decatur County: DeKalb State: Georgia



Date:
4/22/2013
Analyst:
ray yeager



Legend

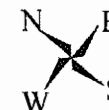
Soil Contaminated Above Type III RRSs

5-15 ft.

8-15 ft.

12-15 ft.

◆ Soil Sampling Location



0 10 20
Feet

Notes:

EDG - East Decatur Greenway
RRSs - Risk Reduction Standards
SB - Soil Boring

All intervals shown are in feet
below ground surface

Map Source:

Bing Aerial Imagery Service



United States
Environmental Protection Agency
Region 4

FIGURE 4 Soil Contaminated Above Type III RRSs

TDD Name: East Decatur Greenway
Petroleum TBA

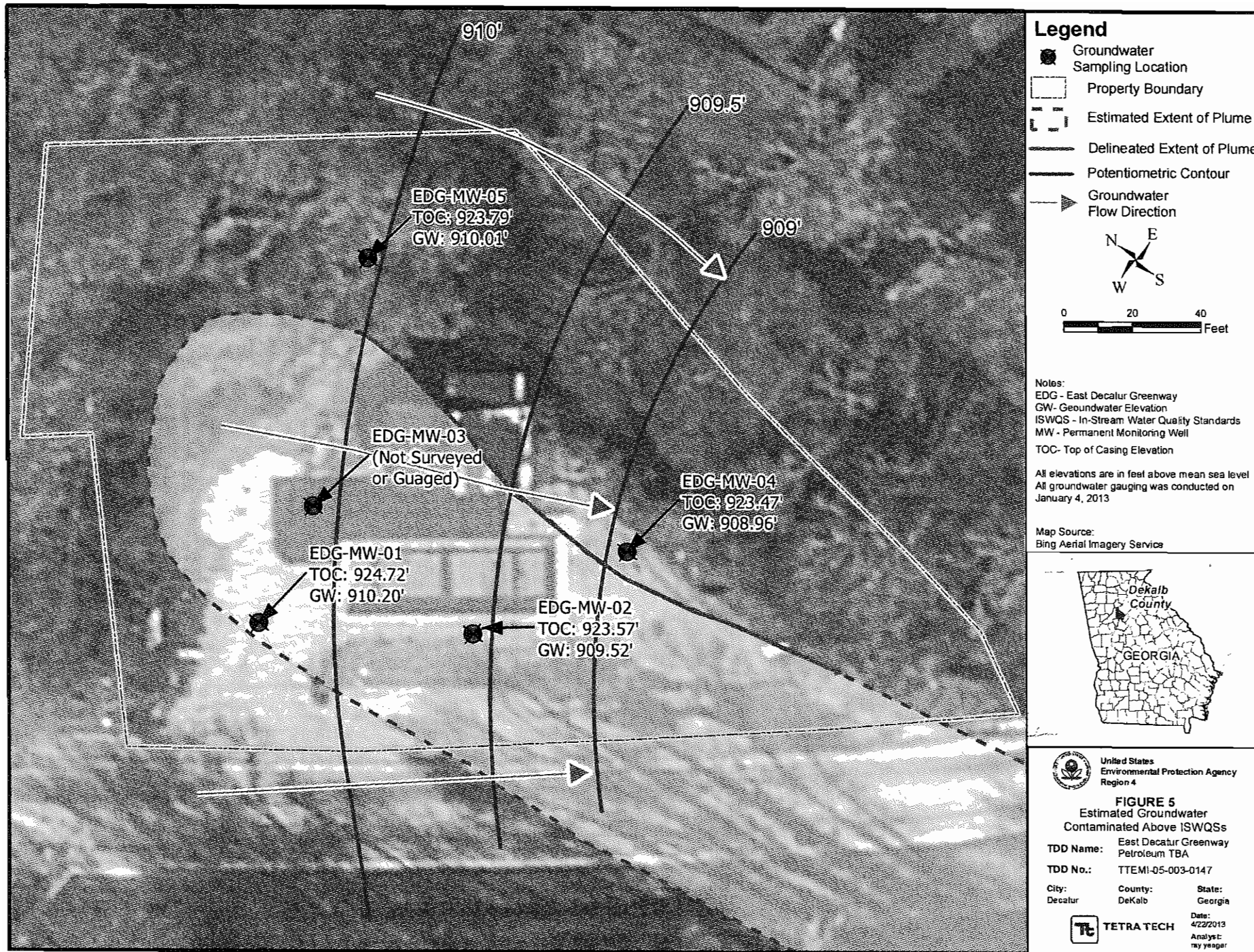
TDD No.: TTEMI-05-003-0147

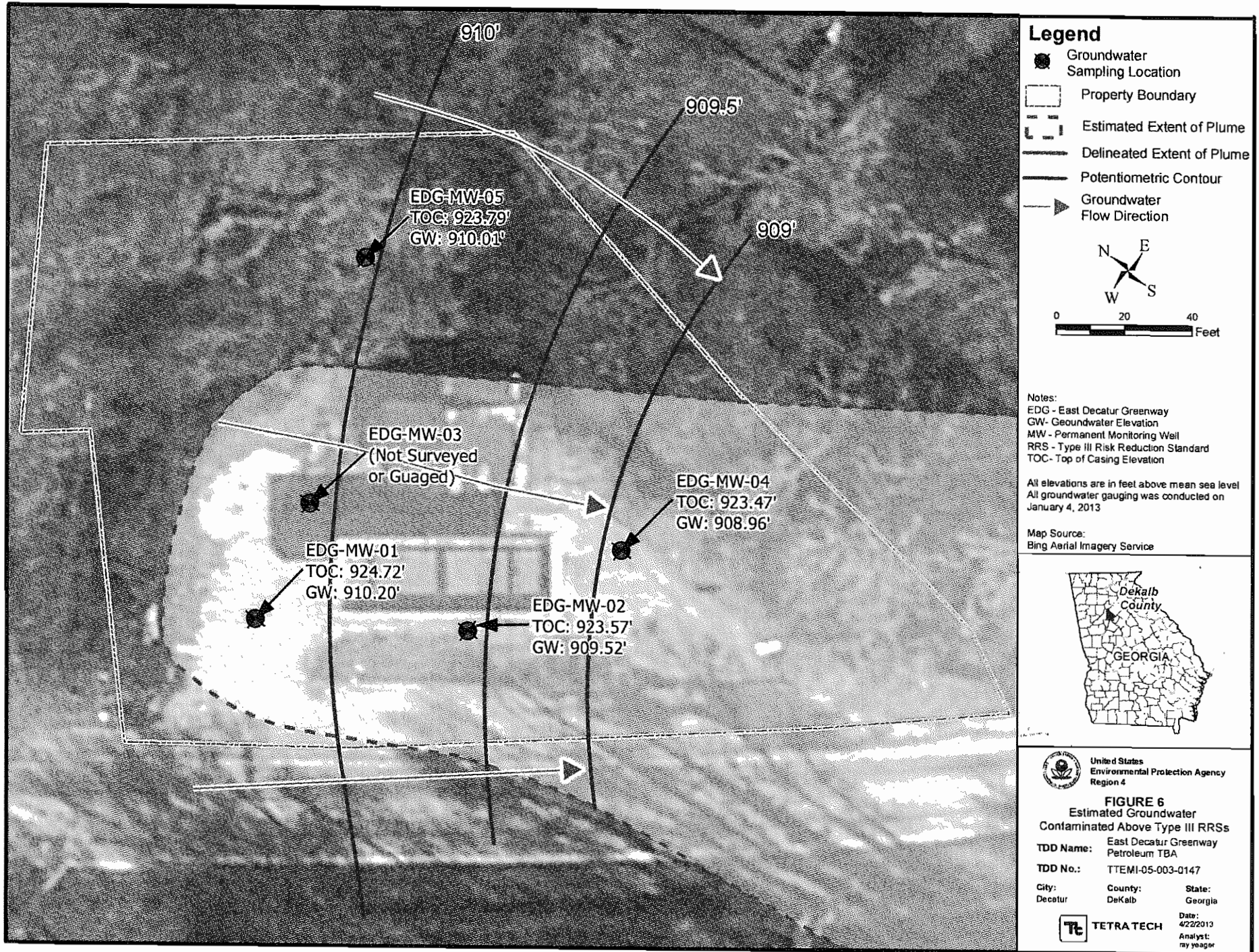
City: Decatur County: DeKalb State: Georgia

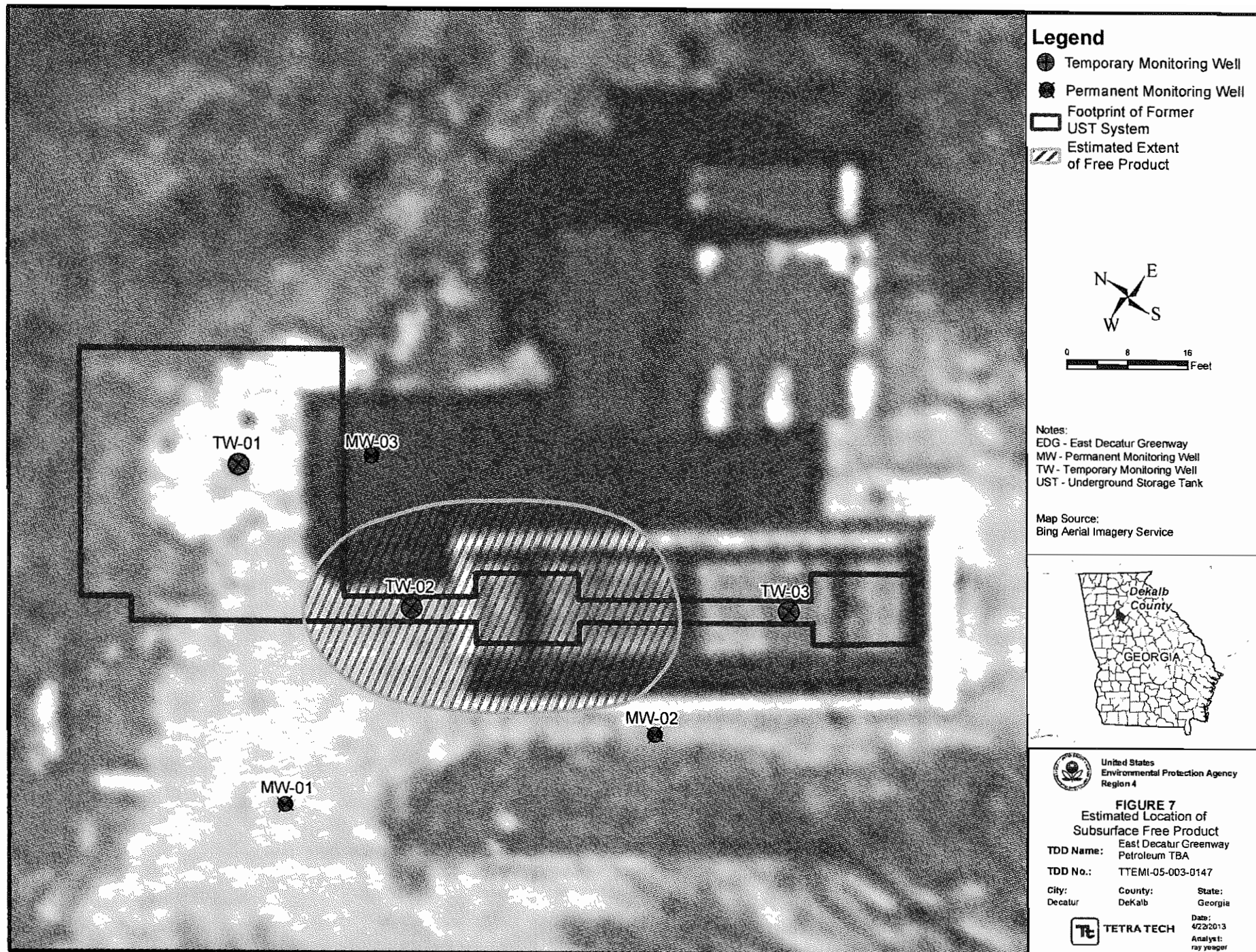


TETRA TECH

Date:
4/22/2013
Analyst:
ray.younger







Enclosure 2: Tables

Table 1: Costs and Assumptions Associated with Remedial Alternatives

TABLE 1
COSTS AND ASSUMPTIONS ASSOCIATED WITH REMEDIAL ALTERNATIVES

| Remedial Alternative | Cost (USD) | Assumptions |
|---|-------------------------------|--|
| Soil and Groundwater Contamination | | |
| Option 1 – Monitored Natural Attenuation | \$16,000 to \$20,000 per year | Costs are based on quarterly (typical) soil and groundwater sampling and report preparation and submittal by a licensed environmental consultant. |
| Option 2 – Soil Removal | \$216,000 to \$312,000 | Costs are based on estimated quantities of suspected contaminated soil. Volumes are based on Phase II sampling results and per unit excavation/disposal/backfill costs are based on bids received during the Phase II subcontractor procurement process. |
| Option 3 – Air Sparging/Soil Vapor Extraction | \$200,000 to \$350,000 | Cost estimates were prepared by an experience remediation engineer familiar with the contamination levels and environmental conditions in the area of East Decatur. |



January 6, 2014

Ms. Michele Ritan, Director
East Decatur Greenway
P.O. Box 2316
Decatur, GA 30031

1233 Washington Street
Suite 1000
Columbia, SC 29201
USA

Phone (803) 929-6060
Fax (803) 929-6065

www.cardno.com

Re: Final Analysis of Brownfield Cleanup Alternatives (ABCA) Addendum
East Decatur Greenway Site (Former Speed Trip)
890 Columbia Drive
Decatur, DeKalb County, Georgia

Dear Ms. Ritan:

Cardno has completed a review of a *Phase I Environmental Site Assessment [ESA] Report, Phase II Environmental Site Assessment Report, and Final Analysis of Brownfield Cleanup Alternatives [ABCA]* all prepared by Tetra Tech, Inc. (Tetra Tech) and dated May 1, 2013. The ABCA was prepared for the East Decatur Greenway (EDG) as a continuation of a Targeted Brownfield Assessment (TBA) of the former Speed Trip site located at 890 Columbia Drive in Decatur, Georgia (**Figure 1**). The site was acquired by the EDG as part of their on-going effort to build a greenway in East Decatur, along the Middle Fork of Shoal Creek. The ABCA was generated by Tetra Tech in anticipation of the EDG applying for an Environmental Protection Agency (EPA) Brownfield Cleanup Grant at the site. Cardno is assisting the EDG in the preparation and submittal of the Grant Application.

Subsequent to our review of the assessment reports and ABCA, Cardno recommends that the EDG consider additional remedial technologies in order to mitigate documented soil and groundwater contaminants at the site. While Cardno agrees with Tetra Tech's conclusion that air sparging (AS) and soil vapor extraction (SVE) are effective remedial technologies in treating dissolved groundwater contaminants, they are not very effective at addressing the free-phase petroleum product (free product) that was detected in temporary monitoring well TMW-2 during the Phase II ESA activities. Additionally, Cardno believes that a less costly, in-situ (in place), technology (enhanced aerobic bioremediation) will accomplish the same goal as AS/SVE. **Table 1** is a summary of the cleanup technology balancing factors. **Table 2** is a summary of the projected implementation costs.

Free Product Removal

Free product is a light non-aqueous phase liquid (LNAPL) that floats on top of the groundwater surface. As the free product and groundwater mingle, contaminants dissolve from the free product and into the groundwater where it migrates towards sensitive



receptors, in this case Shoal Creek. Cardno believes that the most pressing issue at the site is the removal of free product from the subsurface.

Cardno recommends the removal of free product from the subsurface using a technology known as multi-phase extraction (MPE). MPE is conducted using a mobile vacuum truck connected to selected extraction wells that contain the free product. Once the truck is hooked up to the wells, a high vacuum is applied to the subsurface rapidly taking in vapors, free product, and groundwater (multiple phases) from the subsurface. The effluent is then containerized in the truck and transported for disposal at an appropriate off-site location. MPE has a track record of success in removing free product from the subsurface in an efficient manner and relatively inexpensive technology compared to AS/SVE that is not used for free product removal and expensive to install and operate.

In order to conduct multi-phase extraction (MPE) at the site, we propose to install up to three, 2-inch recovery/monitoring wells in the expected free product plume area (as defined by Tetra Tech) as shown on **Figure 2**. Since free product floats on top of the water table surface, the wells will be installed with a screened interval to bracket the water table aquifer or to optimize the amount of free product recovered.

Enhanced Aerobic Bioremediation

Subsequent to free product removal, enhanced aerobic bioremediation is proposed in order to boost the naturally occurring processes in the subsurface that are acting to remediate petroleum hydrocarbons. This type of remedial technology is used to treat contaminants in the unsaturated (above the water table) and saturated (below the water table) zones. Supplemental oxygen sources are injected into the subsurface where natural hydrocarbon degrading bacteria have been denied access to natural oxygen by the contaminants. The enhanced oxygen spurs the bacteria to speed up their natural processes of "eating" the contaminants, thereby remediating the site and removing the risk. Enhanced bioremediation is an effective technology to reduce contaminant levels in the soils and has been proven to work on similar sites. Cardno is recommending this in-situ remediation technology over the proposed technology by Tetra Tech because of its ease of implementation and lower cost than the equipment, installation, and operation of an AS/SVE system.

Cardno is proposing to inject the Regenesis product RegenOx PetroCleanze™ (or similar product) in two events across the treatment area. Injection points will be installed on approximately 10 to 15-foot centers using direct push technology (DPT) within the area where free product was removed. Oxygenate will be delivered to the subsurface directly through the push rods. The injection zone is proposed to be 10 feet thick and include both the saturated and unsaturated zones. In order to ensure a more complete saturation of the subsurface with the oxygenate, the points during the second injection event will be off-set by approximately 5 to 10 feet from the first event locations.

Please contact me at (803) 929-6071 or brian.kvam@cardno.com should you have further questions or need any additional information.



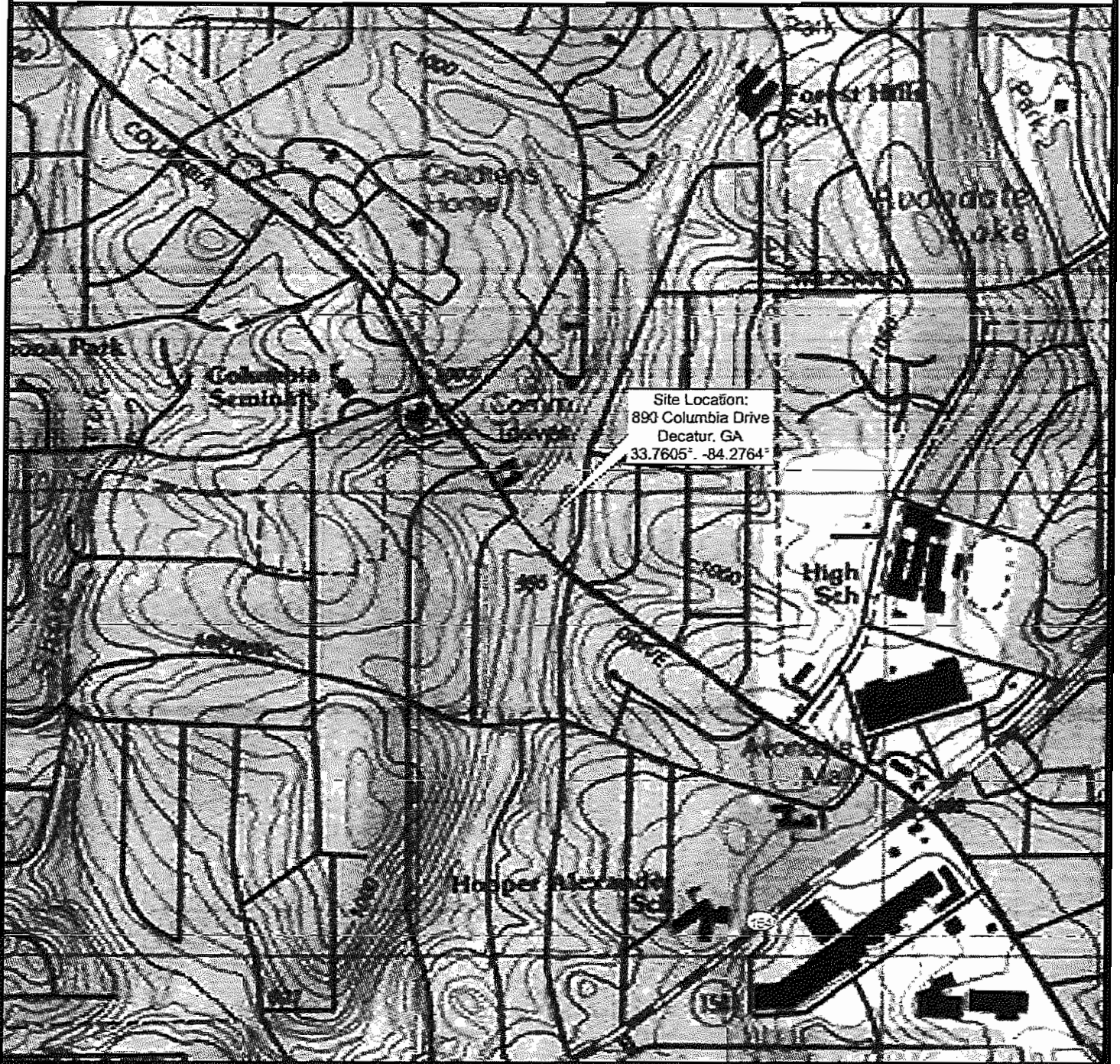
Regards,

A handwritten signature in black ink that reads 'Brian J. Kvam'.

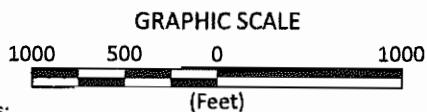
Brian Kvam, P.E.
Senior Project Manager
Cardno

Cc: File

Attachments: Figure 1 – Site Location Map
Figure 2 – Free Product / Treatment Area Map
Table 1 – Brownfield Cleanup Alternatives Balancing Factors Evaluation
Table 2 – Estimated Comparative Costs for Cleanup Alternatives



File: L:\TERR\95-023-0107_East Decatur, Decatur, Georgia



Notes:
1. Figures from Tetra Tech Phase II ESA Report.

Figure 1 - Topographic Location Map

East Decatur Greenway (Former Speed Trip)
890 Columbia Drive
Decatur, DeKalb County, Georgia

Project Mngr: GRJ

Designed By: BJK

Checked By: GRJ

Approved By: GRJ



1233 Washington St., Suite 1000
Columbia, SC 29201
1-800-846-8001

Project No. TBD

Scale: 1 in. = 1000 Ft.

Date: 1/6/2014

Drawn By: BJK

File Name: FIGURES_ABCA_EDG.dwg

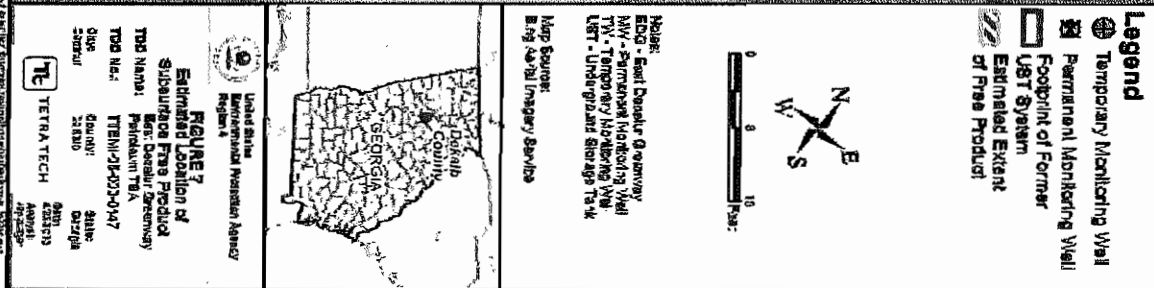
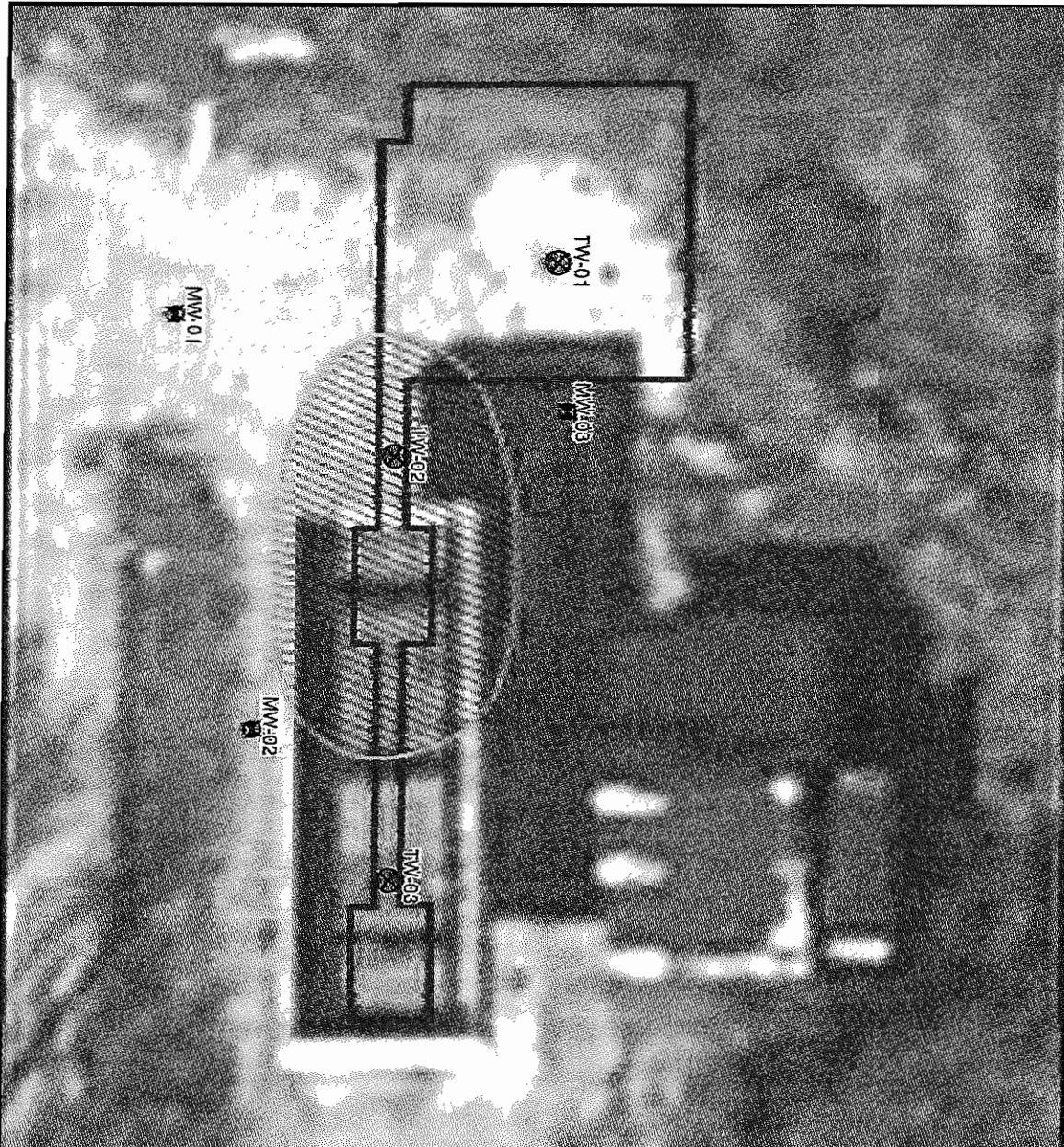


Figure 2 - Aerial Site Map

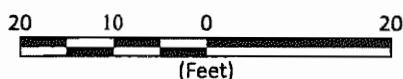
East Decatur Greenway (Former Speed Trip)
 890 Columbia Drive
 Decatur, DeKalb County, Georgia

| | | | |
|---------------------------------|-----|-------------|----------------|
| Project Mgr: | GRJ | Project No. | PB08500001 |
| Designed By: | BJK | Scale: | 1 in. = 20 Ft. |
| Checked By: | GRJ | Date: | 10/15/2013 |
| Approved By: | GRJ | Drawn By: | BJK |
| File Name: FIGURES_ABCA_EDG.dwg | | | |



1233 Washington St., Suite 1000
 Columbia, SC 29201
 1-800-846-6001

GRAPHIC SCALE



Notes:

- Figures from Tetra Tech Phase II ESA Report.



Table 1: Brownfield Cleanup Alternatives Balancing Factor Evaluation

| Remedial Alternative | Effectiveness | Long-Term Reliability | Implementation/Implementation Risk | Cost Implications |
|--|---|---|---|--|
| 1. No Action | Does not address potential risks. | Does not address potential risks. | No implementation risk. | No cost implications. |
| 2. Free Product Removal by MPE w/Enhanced Aerobic Bioremediation | Removes free product (a continuing source of dissolved contaminants) from the subsurface. Effectively eliminates potential to exposure from groundwater contact. Proper disposal at an off-site location. | Eliminates the risk associated with exposure to contaminated groundwater at the site. | Minimal implementation hazards and minor implementation risks associated with the installation of recover/monitoring wells and DPT injection points. No risk from the break down of equipment or the difficult implementation of installing, operating, and maintaining AS/SVE equipment. | Low to moderate costs for well installation, bioremediation product, and MPE events. |

Notes:

1. The above alternative does not take into consideration any excavation and disposal of soil or debris from the site.

Table 2: Estimated Comparative Costs for Cleanup Alternatives

| Cleanup Alternative | Estimated Costs | Notes |
|--|-----------------|--|
| 1. No Action | \$0 | Not a viable option. |
| 2. Free Product Removal by MPE w/Enhanced Aerobic Bioremediation | \$134,070 | MPE Events (\$21,070): This includes the installation of 3 recovery/monitoring wells @\$7,425; completion of 3, 8-Hr. MPE events @ \$13,645. Enhanced Aerobic Bioremediation (\$113,000): 2 injection events by DPT over an estimated area of ~2,030 Ft2 including product and injection @ \$113,000. |

Notes:

1. All costs are estimated and approximate
2. Confirmation sampling costs are not included in the above estimates
3. The above costs do not include any excavation, transportation, or disposal of soil or debris, if needed.



AGENDA

EAST DECATUR GREENWAY

2014 BROWNFIELDS EPA CLEANUP GRANT

**Columbia Presbyterian Church
Thursday, January 9, 2014
6:30 p.m.**

1. Introductions and Sign-In
 - a. East Decatur Greenway - Michele Ritan
 - b. US EPA Region IV - Camilla Warren
 - c. Cardno - Roger Register
2. Why we are here?
 - a. Requirement of Grant Submittal
 - b. Show Public Support
 - c. Receive Public Comments/Interactive Meeting
3. Current Site Status
 - a. Types of Contamination
 - i. Petroleum Constituents
4. Draft of Analysis of Brownfields Cleanup Alternatives (ABCA)
 - a. Discussion of Alternatives (see handout)
 - b. Receive and Document Public Comments
5. Open Discussion and Questions
6. Adjourn

[illegible]

East Decatur Greenway
EPA Brownfields Cleanup Grant Application
For Former Gas Station at 890 Columbia Drive
Comments:

How fast can this happen?

what has to be ~~be~~ done at site?

Will the site go GA BFs or other program

Project so need in community

Grant application looks good

**Responses to Questions
East Decatur Greenway Public Meeting
January 9, 2014**

1. How fast can this happen?
Once we mobilize to the site, it will take at most 4-6 months, but that does not mean 4-6 months from the time the grant is announced. If the grant is successful, the funding has to be awarded which is likely to be September 30, 2014. Then, it may take up to 6 months to get all plans approved and a contractor selected for the on-site work. The best estimate that we can give is the fall of 2015.
2. What has to be done at the site?
The petroleum free product that is floating on the groundwater has to be removed. Then, the soils have to be cleaned to Georgia EPD standards.
3. Will the site go GA Brownfields or another program?
The site will go through the GA Brownfields program.



Post Office Box 14327
Atlanta, Georgia 30324
404 875 7284 TEL
404 875 3242 FAX
pathfoundation.org
pach@pathfoundation.org

December 2, 2013

To Whom It May Concern:

Executive Director

Edwin E. McBrayer, Jr.

BOARD OF DIRECTORS

William C. Fowler, *Chair*
B. Harvey Hill, Jr., *Vice Chair*
Charles Shufeldt, *Secretary*
Harry L. Anderson, *Treasurer*
Samuel Bacote
Jennifer Dorian
W. Douglas Ellis, Jr.
Samuel G. Friedman
Bo Heiner
Warren Y. Jobe
James C. Kennedy
Sarah K. Kennedy
E. Cody Laird, Jr.
Carol Muldawer
Laura Richards
Alexander C. Taylor
Andrew J. Young

East Decatur Greenway is seeking an EPA Brownfields cleanup grant for 890 Columbia Drive in Decatur, Georgia. East Decatur Greenway (EDG) is collaborating with the PATH Foundation to redevelop the environmentally contaminated property at 890 Columbia Drive in Decatur, Georgia. EDG proposes to redevelop the site as a trailhead to support a shared-use trail to include parking, benches, trash receptacles, way finding signs and bike racks.

The proposed PATH trail will begin at 890 Columbia Drive and terminate at the Avondale MARTA (public transit rail) station. It will connect thousands of South Decatur residents to the MARTA station with a dedicated facility for non-motorized vehicles. PATH has already contributed hundreds of staff hours and paid consultants over \$15,000 to advance the project through planning and design. PATH is prepared to construct the trail during 2014 utilizing public and private funding in the amount of \$750,000.

The clean up and reuse of the contaminated site is essential to the viability of the project since it will be the only dedicated parking at the southern end of the trail. Please give favorable consideration to this proposal. It will provide a safe and healthy alternative to automobile travel for many DeKalb residents.

Sincerely

Ed McBrayer
Executive Director, PATH Foundation

Charles E. Bosserman

23 January 2013

To Whom It May Concern:

The purpose of this letter is to confirm my support of the construction of a bicycle/pedestrian trail in partnership with East Decatur Greenway and the PATH Foundation. The proposed trail will have a trailhead on the property at 890 Columbia Drive and terminate at the Avondale MARTA (rapid rail) station.

The estimated cost of this trail segment is \$750,000. I have pledged \$200,000 toward this amount, with the remaining costs being covered by the PATH Foundation, the City of Decatur, and DeKalb County.

In order to place the trailhead at 890 Columbia Drive, the property requires cleanup of soil and groundwater contamination. Thus, I support East Decatur Greenway's application for a Brownfields Cleanup Grant to accomplish this.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles E. Bosserman", written in a cursive style.

761 John Ringling Blvd
Sarasota FL

Charles E. Bosserman

23 January 2013

To Whom It May Concern:

East Decatur Greenway has acquired the property at 890 Columbia Drive, Decatur, Georgia with the intention of remediating environmental contamination and converting it to greenspace. In addition, plans include placement of a trailhead for a bicycle/walking path on the property.

I own several small parcels adjacent to 890 Columbia Drive. It is my intention to donate them to East Decatur Greenway in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles E. Bosserman", written in a cursive style.

761 John Ringling Blvd
Sarasota FL



14 January 2014

To Whom It May Concern:

Forrest Hills Neighborhood is located just after 890 Columbia Drive, a former gas station that sat empty and ignored for years. Several of our neighbors who live on N. Carter Rd. have homes that back-up to the gas station property and have struggled since its closing to get an adequate response from the previous owners to complaints about environmental contamination, the presence of vagrants and the general unsightliness of the property. Our neighborhood is thrilled that East Decatur Greenway has acquired this property and fully supports the transformative impact they have already made in their early clean-up efforts.

Through responses to neighborhood surveys and community meetings, we know that many of our neighbors are interested in creating greenspace and promoting safe, non-automobile transportation. East Decatur Greenway's current work with the PATH Foundation to create a dedicated (off street) bicycle/pedestrian trail with a trailhead on the former gas station property has generated excitement and support throughout the neighborhood.

Several Forrest Hills residents, as well as the Board of the Forrest Hills Neighborhood Association, have already made donations to East Decatur Greenway in appreciation and support of their ongoing clean-up work at 890 Columbia Drive. Additionally, neighbors have expressed interest in providing ongoing support in the following ways:

- Serve on a Brownfields Task Force, a committee made up of community people who will be available to attend meetings, relay information to neighbors, and help guide the cleanup process.
- Contribute funds to the project.
- Volunteer time to help with landscaping projects.
- Contribute plant material to landscaping projects.

The Board of the Forrest Hills Neighborhood Association fully supports East Decatur Greenway's application for an EPA Brownfields Cleanup grant. While individual donations from neighbors are an important step to continued progress, we know the level of financial support required to fully address the environmental contamination and complete the gas station's transformation to a community asset is significant. On behalf of the residents Forrest Hills, we sincerely hope that East Decatur Greenway is selected for funding so they can continue their work.

Sincerely,

Elaina Ouimet

Board Member

Forrest Hills Neighborhood Association



Midway Woods Neighborhood Association
2902 Midway Rd
Decatur, GA 30030

January 14, 2014

The Midway Woods Neighborhood Association (MWNA) would like to notify you of our excitement and support for East Decatur Greenway's application for an EPA Brownfields Cleanup Grant at the former gas station property located at 890 Columbia Drive.

This neglected piece of property has been the source of much frustration to our community for many years. The contamination of the property and subsequent inability for it to be sold or redeveloped for any purpose was a problem for a long time. Before it was acquired by East Decatur Greenway in the fall of 2012, this property was a perpetual code violation, graffiti canvas, and magnet for illicit activity.

We are ecstatic about the possibility of remediating the environmental hazards at 890 Columbia Drive. Undertaking these steps will contribute to the state's clean water supply and create a healthier environment for DeKalb residents.

We support the reuse and restoration of this property for use as a greenspace with native vegetation. This type of reuse would complement initiatives our association is currently undertaking to remove invasive species and restore native plants at Dearborn Park, a DeKalb County park, located within Midway Woods.

The MWNA is committed to the upcoming community oriented process. Actions we are committed to include:

- Serve on a Brownfields Task Force.
- Contribute funds to the project including being featured in neighborhood fundraisers.
- Volunteer time to help with landscaping projects.
- Contribute plant material to landscaping projects and donated building material and expertise from our residents.

MWNA represents a community with over 700 homes. Please see our website to learn more about our organization and our neighborhood's location.

Thank you.

(original signed)

Adrianna Berlin, CSW
President, Midway Woods Neighborhood Association
president@midwaywoodsneighborhood.com

www.midwaywoodsneighborhood.com

Good Things Are Growing in the Woods

THE FRIENDS SCHOOL of ATLANTA

9 January 2013

To Whom It May Concern:

The Friends School of Atlanta (FSA) campus is directly adjacent to 890 Columbia Drive, a former gas station that has environmental contamination. We are very happy that East Decatur Greenway (EDG) has acquired this property, and is working to remove the contamination and transform it into a community asset.

FSA has endorsed East Decatur Greenway's efforts by writing the letter of support for EDG's application for a Targeted Brownfields Assessment from EPA Region IV (which they received). We were delighted to see the beginning of the cleanup of this property, which has been a public eyesore for decades, as well as an environmental hazard. We particularly welcome the remediation of soil and groundwater contamination because of concerns about its effect on the health of our students.

There are several ways in which FSA can support EDG's efforts going forward:

- Provide meeting space as needed for advisory groups or other functions
- Parents and staff could serve on a Brownfields Task Force.
- Parents, staff, and students can contribute to landscaping efforts after the cleanup is complete.
- Members of our community can make financial contributions to EDG's efforts.
- Teaching staff can work with EDG to promote environmental education.

We wholeheartedly support East Decatur Greenway's application for an EPA Brownfields Cleanup grant. After so many years as a community eyesore as well as a health hazard, we welcome this property's new life as greenspace. It will be a great asset to FSA to have a place of beauty next door that can be used by our school community for environmental education, gardening, and reflection.

Sincerely,



Waman French
Head of School
The Friends School of Atlanta



COLUMBIA PRESBYTERIAN CHURCH

Connecting people to God
to each other
to the needs of the world

15 January 2013

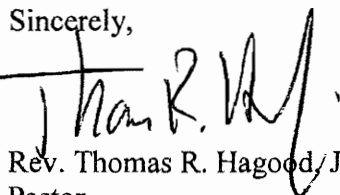
To Whom It May Concern:

Columbia Presbyterian Church is right across the street from 890 Columbia Drive, a former gas station that has environmental contamination. We are very happy that East Decatur Greenway has acquired this property and is working to remove the contamination and transform it into a community asset.

The church has supported East Decatur Greenway's efforts through providing meeting space for the organization. Some of our members have made financial contributions. In the future, we will continue to offer meeting space for East Decatur Greenway's use. Some of our members will likely be interested in serving on a brownfields advisory committee as well. Our church members will also be assisting in future beautification efforts of the greenway.

We support East Decatur Greenway's application for an EPA Brownfields Cleanup grant. After so many years of this property being a community eyesore as well as a health hazard, we welcome its new life as greenway and as a trailhead for a bicycle and walking path.

Sincerely,


Rev. Thomas R. Hagood, Jr.
Pastor





January 17, 2014

To Whom It May Concern:

The Waldorf School of Atlanta (WSA) is located at 711 Columbia Dr, a few hundred yards from 890 Columbia Drive. Many of our families live in Forest Hills, Midway Woods and Winonna Park. A number of those children walk along Columbia to attend school each day. We are very happy that East Decatur Greenway (EDG) has acquired this property, is working to remove the contamination and transform it into a community asset.

WSA is very encouraged by the success of East Decatur Greenway's efforts to secure a Targeted Brownfields Assessment from EPA Region IV. WSA owns a small lot off Columbia Rd on Conway Rd which is mostly retention pond. The restoration of 890 Columbia Dr, which has been an unfortunate eyesore, as well as an environmental hazard to the flora and fauna using our pond, will have an extremely positive effect on the surrounding neighborhoods and schools.

There are several ways in which WSA can support EDG's efforts going forward:

- Provide meeting space as needed for advisory groups or other functions
- Contribute to landscaping efforts after the cleanup is complete.
- Help raise awareness of EDG's efforts and the impact it will have on the locale.
- Work with EDG to reinforce environmental awareness.

WSA wholeheartedly supports East Decatur Greenway's application for an EPA Brownfields Cleanup grant. After so many years as a community eyesore as well as being a health hazard, we welcome this property's new life as green space. We also support EDG's Mission to create workable connections to green space in our community.

Sincerely,

Sara Walsh

Administrator, and for The Leadership Team

Appendix 3 Other Factors Checklist

Name of Applicant: East Decatur Greenway

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

| | Other Factor | Page # |
|---|--|--------|
| | Community population is 10,000 or less | |
| | Federally recognized Indian tribe | |
| | United States territory | |
| | Applicant will assist a Tribe or territory | |
| | Targeted brownfield sites are impacted by mine-scarred land | |
| | Targeted brownfield sites are contaminated with controlled substances | |
| | Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress | |
| | Project is primarily focusing on Phase II assessments. | |
| X | Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation | 9 |
| | Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions. | |
| | Recent (2008 or later) significant economic disruption (<u>unrelated</u> to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base. | |
| | Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, <u>applicant must attach documentation</u> which demonstrates this connection to a HUD-DOT-EPA PSC grant. | |
| | Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant | |
| | Community is implementing green remediation plans. | |
| | Climate Change (also add to "V.D Other Factors") | |